

Edwin Aiwazian (SBN 232943)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 279015)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

SEYED RAMIN ASBAGHI, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

v.

PUTNAM CHEVROLET CADILLAC, INC., a
California corporation; PUTNAM
CHEVROLET CADILLAC, LLC, a California
limited liability company; PUTNAM GM, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

CASE NO.: 21-CIV-04343

Honorable Jeffrey R. Finigan
Department 24

PROOF OF SERVICE

Complaint Filed: August 12, 2021
Trial Date: Not Set

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 410 West Arden Avenue, Suite 203, Glendale, California 91203.

On September 18, 2024, I served the foregoing document(s) described as:

- **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT; MEMORANDUM OF POINTS AND AUTHORITIES**
- **DECLARATION OF SEYED RAMIN ASBAGHI IN SUPPORT OF MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT**
- **DECLARATION OF VARTAN MADROYAN IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AGREEMENT**
- **[PROPOSED] ORDER AND JUDGMENT GRANTING APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (CAL. LABOR CODE § 2698, *ET SEQ.*) SETTLEMENT AGREEMENT**

on interested parties in this action as follows:

John P. Boggs
jboggs@employerlawyers.com
David J. Reese
dreese@employerlawyers.com
Daniel J. Padova
dpadova@employerlawyers.com
FINE, BOGGS & PERKINS LLP
111 West Ocean Blvd., Ste 2400
Long Beach, California 90802
Tel: (562) 366-0861
Fax: (562) 490-8561

Attorneys for Defendants PUTNAM CHEVROLET CADILLAC, INC., CHEVROLET CADILLAC, LLC, and PUTNAM GM

[X] BY E-MAIL

The above-referenced document was transmitted to the person(s) at the e-mail addresses listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency

Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

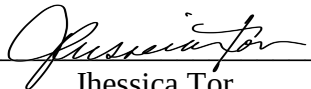
[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 18, 2024, at Glendale, California.


Jessica Tor