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*Attorneys for Plaintiff, Aggrieved Employees,  
and the State of California*

**SUPERIOR COURT OF CALIFORNIA**  
**COUNTY OF ALAMEDA**

KIMBER SEYBERT,  
on behalf of the State of California and Aggrieved  
Employees,

Plaintiff,

vs.

CHLN, INC., LANDRY'S INC., AND  
LANDRY'S PAYROLL, INC.,

Defendants.

Case No. RG21087543

**PLAINTIFF'S NOTICE OF MOTION AND  
MOTION FOR APPROVAL OF PAGA  
SETTLEMENT**

*Assigned for All Purposes to  
Hon. Karin Schwartz*

Date: July 8, 2026

Time: 3:00 PM

Location: Dept 20

Reservation ID: 216928245974

Action Filed: February 2, 2021

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on July 8, 2026 at 3:00 p.m., or as soon thereafter as the matter  
3 may be heard in Department 20 of the above-captioned Court, the Honorable Karin Schwartz  
4 presiding, Plaintiff Kimber Seybert, by and through undersigned counsel, will and hereby does move  
5 for an Order, pursuant to California Labor Code § 2699(s)(2), approving the Private Attorneys General  
6 Act Settlement Agreement, fully executed as of March 17, 2026 (the “Settlement” or “Agreement”),  
7 and attached as Exhibit 1 to the Declaration of Esther L. Bylsma (“Bylsma Decl.”).

8 This motion is based on this notice and motion, the accompanying memorandum of points and  
9 authorities, the Bylsma Decl., the Settlement, the records and file herein, and any other evidence that  
10 may be presented at the hearing, if any, on this motion. A Proposed Order and Judgment is also  
11 submitted herewith.

12 DATED: June 8, 2026

SCHNEIDER WALLACE  
COTTRELL KIM LLP

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15 By: /s/ Esther L. Bylsma  
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