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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

QUAID DANIELS on behalf of himself and on
behalf of all persons similarly situated,

Plaintiff,

v.

AVMC, LLC dba TOYOTA OF
LANCASTER, a California limited liability
company; and Does 1-50, Inclusive,

Defendants.

Case No: 21STCV07885

Action Filed: August 6, 2020

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Date: August 16, 2022

Time: 9:00 a.m.

Reservation ID: 645614952695

Dept.: 39

Judge: Hon. Stephen I. Goorvitch

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on August 16, 2022, at 9:00 a.m. in Department 39
3 of the above-entitled Court before the Honorable Judge Stephen Goorvitch, Plaintiff QUAID
4 DANIELS (“Plaintiff”) will apply for an order approving the PAGA settlement in accordance with
5 Labor Code §2699(l). The proposed settlement is set forth in the accompanying Private Attorney
6 General Act (Labor Code Section 2698 *et seq.*) Stipulation of Settlement of PAGA Claims and
7 Release of PAGA Claims (the “Settlement Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Settlement Agreement between the parties, and the complete files and records in this action. All
11 parties have approved the Settlement Agreement and have met and conferred regarding the motion;
12 therefore, this motion is not opposed by Defendant. The Labor Workforce Development Agency has
13 been served with this motion and the Settlement Agreement as set forth in the accompanying
14 Declaration of Shani O. Zakay. As this Motion is unopposed, the Parties respectfully request relief
15 from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

16 DATED: July 22, 2022
17

18 **ZAKAY LAW GROUP, APLC**

19 By: 
20 _____

21 Shani O. Zakay
22 Julieann Alvarado
23 Attorneys for Plaintiff
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Court Reservation Receipt

Reservation

Reservation ID: 645614952695	Status: RESERVED
Reservation Type: Motion re: (Approval of PAGA Settlement)	Number of Motions: 1
Case Number: 21STCV07885	Case Title: QUAID DANIELS vs AVMC LLC. DBA TOYOTA OF LANCASTER
Filing Party: Quaid Daniels (Plaintiff)	Location: Stanley Mosk Courthouse - Department 39
Date/Time: August 16th 2022, 9:00AM	Confirmation Code: CR-HAC6YYCVJ82CZOTEF

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
TOTAL			\$61.65

Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX7349	Authorization: 00165G

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