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Attorneys for Plaintiff BRITTNEY JONES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

BRITTNEY JONES, an individual, in her
representative capacity on behalf of the State of
California and fellow Aggrieved Employees,

Plaintiffs,

vs.

ASD6 LLC, a California Limited Liability
Company; and Does 1 through 50, Inclusive,

Defendants.

Case No: 37-2021-00016864-CU-OE-CTL

Action Filed: July 9, 2021

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

Date: April 15, 2022

Time: 1:30 p.m.

Dept.: C-72

Judge: Hon. Timothy Taylor

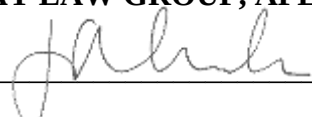
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on April 15, 2022 at 1:30 p.m., or as soon thereafter
3 as the matter can be heard, in Department C-72 of the above-entitled Court, before the Honorable
4 Judge Timothy Taylor, Plaintiff BRITTNEY JONES (“Plaintiff”) will apply for an order approving
5 the PAGA settlement in accordance with Labor Code §2699(l). The proposed settlement is set forth
6 in the accompanying Private Attorney General Act (Labor Code Section 2698 *et seq.*) Stipulation of
7 Settlement and Release (the “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 Agreement between the parties, and the complete files and records in this action. All parties have
11 approved the Agreement and have met and conferred regarding the motion; therefore, this motion is
12 not opposed by Defendant. The Labor Workforce Development Agency has been served with this
13 motion and the Agreement as set forth in the accompanying Declaration of Shani O. Zakay. As this
14 Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by
15 California Rules of Court, Rule 3.1113(d).

16 DATED: April 8, 2022
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18 **ZAKAY LAW GROUP, APLC**

19 By: 
20 _____

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