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Attorneys for Plaintiff
BERNIE GERMANI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

BERNIE GERMANI, as an aggrieved employee pursuant to the Private Attorneys General Act ("PAGA"),	)	Case No.: 21STCV11163
	)	
	)	PAGA ENFORCEMENT ACTION
	)	
PLAINTIFF,	)	NOTICE OF MOTION AND MOTION FOR
vs.	)	APPROVAL OF PAGA SETTLEMENT
	)	
HORIZON AIR INDUSTRIES, INC., a	)	
Washington Corporation; Alaska Airlines, Inc., an	)	Date: April 26, 2022
Alaska Corporation; and DOES 1 through 20,	)	Time: 8:30 a.m.
	)	Dept: 78
DEFENDANTS.	)	[Reservation No. 966662442038]
	)	
	)	[Filed concurrently with Memorandum of Points
	)	and Authorities; Declaration of Matthew S.
	)	D'Abusco; Declaration of Cynthia S. Sandoval;
	)	Declaration of Bernie Germani; Declaration of
	)	Carlos Canizales; and [Proposed] Judgment]
	)	
	)	Complaint Filed: March 23, 2021
	)	Trial Date: None
	)	

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

PLEASE TAKE NOTICE that on April 26, 2022, at 8:30 a.m., or as soon thereafter as the matter may be heard, in Department 78 of the above-captioned court, located at 111 North Hill Street, in Los Angeles, California, the Honorable Robert S. Draper presiding, Plaintiffs Bernie Germani and Carlos Canizales ("Plaintiffs"), as aggrieved employees, will and hereby do, move this Court for entry of

1 an order and judgment approving the PAGA settlement pursuant to Labor Code section 2699(l)(2).

2 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of
3 Points and Authorities in Support of Motion for Court Approval of the PAGA Settlement; (3) the
4 Declaration of Matthew S. D'Abusco; (4) the Declaration of Cynthia S. Sandoval; (5) the PAGA
5 Settlement Agreement (attached as Exhibit 1 to the Declaration of Matthew S. D'Abusco); (6) the
6 Declaration of Bernie Germani; (7) the Declaration of Carlos Canizales; and (8) upon such other
7 documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
8 of this Motion. Parties respectfully request relief from the page limit requirement set by California
9 Rules of Court, Rule 3.1113(d).

10 DATED: February 15, 2022

ARES LAW GROUP, P.C.

11
12 By:



Matthew S. D'Abusco

Cynthia S. Sandoval

13 Attorneys for Plaintiffs BERNIE GERMANI and CARLOS
14 CANIZALES, as aggrieved employees pursuant to the
15 Private Attorneys General Act ("PAGA")