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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES
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14 LINZI JULIANO,

15 Plaintiff,

16 vs.

17 Defendants MOUNT ST. MARY'S
18 UNIVERSITY, a California Corporation dba
19 GEENA DAVIS INSTITUTE ON GENDER
20 IN MEDIA dba SEE JANE; CAROLINE
21 HELDMAN, an individual; ELIZABETH
22 KILPATRICK an individual, and DOES 1
23 through 10 inclusive,

24 Defendants.
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CASE NO. 21STCV41842

**NOTICE OF MOTION AND MOTION FOR
COURT APPROVAL OF PAGA
SETTLEMENT AND DISMISSAL OF THE
ACTION**

[Filed concurrently with Memorandum of Points
and Authorities in Support of Plaintiff's Motion]

RESERVATION NO.

Date: December 21, 2021
Time: 8:30 a.m.
Dept. No. 72

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on December 21, 2021 in Department
3 72 of this Court, or as soon thereafter as the matter can be heard, Plaintiff LINZI JULIANO will move
4 this Court for an order from this Court for an order approving the PAGA settlement and dismissing
5 the action with prejudice.

6 This motion is made on the ground that Plaintiff and Defendants have entered into a settlement
7 agreement with respect to all parties and for all causes of action and seek this Court's approval of
8 settlement and dismissal of the action. A redacted copy of the Settlement Agreement will be attached
9 as Exhibit A to the Joint Stipulation and Declaration in Support of Joint Stipulation. If the Court
10 requests, the parties will provide an unredacted copy of the Settlement Agreement for in camera
11 review.

12 Plaintiff's Complaint included claims under PAGA, which the parties also seek to dismiss per
13 the terms of the Settlement Agreement. Under California Labor Code section 2699(1)(2), the Superior
14 Court shall review and approve any settlement of any civil action filed pursuant to the PAGA.
15 California Labor Code section 2699(1)(2) does not prescribe any procedure for how to request court
16 approval of a PAGA settlement, nor is there any requirement for notice in the statute.

17 This motion is unopposed, and all parties will submit a Joint Stipulation for Court Approval
18 of the PAGA Settlement and Dismissal of the Action in support of this motion.

19 The motion will be based on this Notice of Motion, the attached Memorandum of Points and
20 Authorities, the Stipulation of the parties, the Declaration of Nina Montoya in support thereof, and
21 on such other oral and documentary evidence as may be presented at the hearing of the motion.

22 DATED: November 29, 2021

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25 NINA MONTOYA
26 Attorneys for Plaintiff
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