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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ANN KLEIN PACIA, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

KILROY REALTY, L.P., a Limited
Partnership; KILROY REALTY
CORPORATION, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 21STCV20624

**NOTICE OF MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Date: March 29, 2023

Hearing Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice

Department: 1

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on March 29, 2023 or as soon
3 thereafter as the matter can be heard, in Department 1 of the above entitled Court, before the
4 Honorable Judge Stuart M. Rice, Plaintiff ANN KLEIN PACIA (“Plaintiff”) will apply for an order
5 (1) preliminary approving the proposed settlement of this class action with Defendant KILROY
6 REALTY L.P. and Defendant KILROY REALTY CORPORATION (“Defendants”); (2) approving
7 the form and method for providing class-wide notice; (3) directing that notice of the proposed
8 settlement be given to the class; and (4) scheduling a final approving hearing date to consider
9 Plaintiff’s motion for final approval of the settlement and entry of the Judgment, and Plaintiff’s
10 motion for approval of attorneys’ fees and litigation expenses.

11 This motion for preliminary approval of the class settlement is brought pursuant to
12 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
13 motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, the
14 Declaration of Jean-Claude Lapuyade, the Declaration of Ann Klein Pacia, the Declaration of Sean
15 Hartranft, the Declaration of Doug Roy, the Declaration of Lauren Stadler, the Stipulation of
16 Settlement of Class and PAGA Action Claims and Release of Claims (“Agreement”) between the
17 parties, and the complete files and records in this action. All parties have agreed to the proposed
18 class settlement and have met and conferred regarding the motion; therefore, this motion is not
19 opposed by Defendant.

20
21 Respectfully submitted,

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23 DATED: March 6, 2023
24

25 **ZAKAY LAW GROUP, APLC**

26 By: 
27 Shani O. Zakay
28 Attorney for Plaintiff