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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

CAYLA BONDS, individually and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

CITRUS MOTORS ONTARIO, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CIVSB2114893

Honorable David S. Cohn
Department S26

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
REPRESENTATIVE ACTION
SETTLEMENT**

Date: July 12, 2022
Time: 10:00 a.m.
Department: S26

Complaint Filed: May 25, 2021
Trial Date: None Set

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

2 **PLEASE TAKE NOTICE** that on July 12, 2022, at 10:00 a.m., or as soon thereafter as the
3 matter may be heard before the Honorable David S. Cohn in Department S26 of the Superior Court
4 of the State of California, for the County of San Bernardino, located at 247 West Third Street, San
5 Bernardino, California 92415, Cayla Bonds (“Plaintiff Bonds”), plaintiff in the above-captioned
6 action (the “*Bonds Action*”), and Gerardo Velasquez (“Plaintiff Velasquez”), plaintiff in the action
7 entitled *Gerardo Velasquez v. Citrus Motors Ontario, Inc.*, San Bernardino Case No.
8 CIVSB2108083 (the “*Velasquez Action*”), will move this Court (the “Motion”) for entry of an
9 Order:

- 10 1. Granting approval, pursuant to California Labor Code section 2699(l)(2), of the
11 proposed settlement between Plaintiff Bonds and Plaintiff Velasquez (together,
12 “Plaintiffs”) and Defendant Citrus Motors Ontario, Inc. (“Defendant”) of the claims
13 brought pursuant to the Private Attorneys General Act of 2004 (“PAGA”), as set forth
14 in the Private Attorneys General Act Settlement Agreement and Release (“Settlement,”
15 “Agreement,” or “Settlement Agreement”), attached as “**EXHIBIT 1**” to the
16 Declaration of Carolyn M. Bell;
- 17 2. Approving the Gross Settlement Sum available for payment of PAGA Penalties,
18 estimated to be no less than \$433,047.37, of which seventy-five percent (75%) shall be
19 paid to the California Labor and Workforce Development Agency (“LWDA”) and
20 twenty-five percent (25%) will be paid to the PAGA Employees (“Employee Amount”);
- 21 3. Appointing Phoenix Class Action Administration Solutions (“Phoenix”) as the
22 Settlement Administrator;
- 23 4. Directing Defendant to fund the Gross Settlement Fund of \$750,000.00 by way of
24 electronic transfer to the account to be established by the Settlement Administrator for
25 purposes of administration of the Settlement (“Settlement Administration Account”),
26 and directing the Settlement Administrator to distribute the Gross Settlement Fund in
27 accordance with the Settlement Agreement;

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