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13 Attorneys for Plaintiffs  
14 ANGEL BRAVO and PABLO FLORES

15 **CALIFORNIA SUPERIOR COURT**  
16 **IN AND FOR THE COUNTY OF SANTA CLARA**

17 ANGEL BRAVO and PABLO FLORES

18 Plaintiffs,

19 V.

20 GALLAHER COMPANY AND ROBERT  
21 JOHN GALLAHER AND DOES 1  
22 THROUGH 50.

23 Defendants.

Case No: 21CV381912

**PLAINTIFF'S NOTICE OF MOTION FOR  
APPROVAL OF PAGA SETTLEMENT.**

Date: September 18, 2024

Time: 1:30 pm

Dept: 19

Judge: Hon. Theodore C. Zaner

**TO EACH PARTY AND ITS COUNSEL OF RECORD:**

**YOU ARE HEREBY NOTIFIED THAT** on September 18, 2024, at 1:30 p.m. in Department  
19 of the Santa Clara County Superior Court, located at 191 North First Street, San Jose, CA95113,  
Plaintiffs ANGEL BRAVO and PABLO FLORES will, and hereby do, move the Court for an Order

1 approving the settlement reached by the parties under the Private Attorney General Act of 2004, codified  
2 at California *Labor Code* Section 2698, *et seq.* (“PAGA” Settlement).

3 This Motion is based upon this Notice, the accompanying Memorandum of Points and  
4 Authorities, the Declaration of Xiaoming Liu, the Declaration of Tomas E. Margain, the attached  
5 exhibits thereto, the Court’s file, and on such oral and documentary evidence as may be presented at the  
6 hearing on this Motion.

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8  
9 Respectfully submitted,

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11  
12  
13 Dated: August 22, 2024

*Tomas Margain*

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Xiaoming Liu

Tomas E. Margain  
Attorneys for Plaintiffs  
ANGEL BRAVO and PABLO FLORES