

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

RACHEL LATIN, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

ONEMAIN GENERAL SERVICES
CORPORATION., a Delaware Corporation;
and DOES 1 through 50, Inclusive;

Defendants.

Case No: CV-20-002498

**NOTICE OF MOTION AND MOTION
TO APPROVE PAGA SETTLEMENT**

Hearing Date: October 20, 2021
Hearing Time: 8:30 a.m.

Hon. Judge Stacy Speiller
Dept. 12

Trial Date: Not Yet Set
Action Filed: June 8, 2020

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on October 20, 2021, or as soon
3 thereafter as the matter can be heard, in Department 12 of the above-entitled Court, before the
4 Honorable Judge Stacy Speiller, Plaintiff Rachel Latin (“Plaintiff”) will apply for an order
5 approving the PAGA settlement in accordance with Labor Code §2699(l). The proposed
6 settlement is set forth in the accompanying Private Attorney General Act (Labor Code Section
7 2698 *et seq.*) Settlement Agreement and Limited Release (the “Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points
9 and authorities, the Declarations of Shani O. Zakay and Jean-Claude Lapuyade, the Agreement
10 between the parties, and the complete files and records in this action. All parties have approved
11 the Agreement and have met and conferred regarding the motion; therefore, this motion is not
12 opposed by Defendant. The Labor Workforce Development Agency has been served with this
13 motion and the Agreement as set forth in the accompanying proof of service. As this Motion is
14 unopposed, the Parties respectfully request relief from the page limit requirement set by California
15 Rules of Court, Rule 3.1113(d).

16 DATED: September 17, 2021

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18 By: 
19 Shani O. Zakay
20 Attorneys for Plaintiff
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