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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

BREANN HOWARD, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

KOULAX ENTERPRISES, a California
Corporation; and DOES 1 through 50,
Inclusive;

Defendants.

Case No: 21GDCV01154

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: January 14, 2026

Time: 8:30 a.m.

Reservation ID: 465957180582

Judge: Lauren A. R. Lofton

Dept.: X

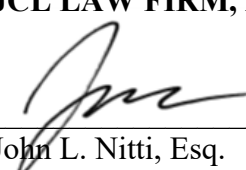
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on January 14, 2026, at 8:30 a.m. or as soon as this
3 matter may be heard in Courtroom X of the above-entitled Court before the Honorable Judge Lauren
4 A. R. Lofton, Plaintiff Breann Howard (“Plaintiff”) will apply for an order approving the California
5 Labor Code Private Attorneys General Act (“PAGA”) settlement in accordance with Labor Code
6 §2699(l). The proposed settlement is set forth in the accompanying PAGA Settlement Agreement
7 (the “Settlement Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Shani O. Zakay, Esq.,
10 the Declaration of Nicholas J. De Blouw, the Declaration of Plaintiff, the Declaration of the
11 Administrator, the Settlement Agreement between the parties, and the complete files and records in
12 this action. All parties have approved the Settlement Agreement and have met and conferred
13 regarding the motion; therefore, this motion is not opposed by Defendant. The Labor Workforce
14 Development Agency has been served with this motion and the Settlement Agreement as set forth in
15 the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed, the Parties
16 respectfully request relief from the page limit requirement set by California Rules of Court, Rule
17 3.1113(d).

18 DATED: November 13, 2025

JCL LAW FIRM, APC

20 By: 

21 John L. Nitti, Esq.
22 Attorney for PLAINTIFF
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Court Reservation Receipt

Reservation	
Reservation ID: 465957180582	Status: RESERVED
Reservation Type: Motion re: (Plaintiff's Motion to Approve PAGA Settlement)	Number of Motions: 1
Case Number: 21GDCV01154	Case Title: BREANN HOWARD vs KOULAX ENTERPRISES
Filing Party: Breann Howard (Plaintiff)	Location: Alhambra Courthouse - Department X
Date/Time: January 14th 2026, 8:30AM	Confirmation Code: CR-AX96MKYCHOKJSCMJJ

Fees			
Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00
TOTAL			\$0.00

Payment	
Amount: \$0.00	Type: NOFEE

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