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16 Attorneys for Plaintiffs

17 **IN THE SUPERIOR COURT OF CALIFORNIA**

18 **IN AND FOR THE COUNTY OF ALAMEDA**

19 THE CALIFORNIA LABOR AND)
20 WORKFORCE DEVELOPMENT)

21 AGENCY, a California governmental)
22 agency, *ex rel.* CARLOS LARA; and)
23 CARLOS LARA, individually,)

24 Plaintiffs,

25 v.

26 VISUAL EDGE, INC., a Delaware)
27 corporation; CHRIS WALLACE, an)
28 individual; and DOES 1-15, inclusive,)

29 Defendants.)
30)
31)
32)
33)
34)

Case No.: RG21105541

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (PAGA) SETTLEMENT**

DATE: NOVEMBER 15, 2023

TIME: 2:30 PM

DEPT. 16

HON. TARA DESAUTELS

RESERVATION ID: 391126737874

1 **TO THE COURT, TO ALL PARTIES, AND TO THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** Plaintiff requests that this Court consider Plaintiff's
3 Motion for Approval of PAGA Settlement on the papers submitted; or alternatively, a hearing
4 will be held on Plaintiff's Motion for Approval of PAGA Settlement on November 15, 2023, at
5 2:30 p.m., in Department 16 of this Court located at 1221 Oak Street, Oakland, California,
6 94612, before the Honorable Tara Desautels, where Plaintiff Carlos Lara ("Plaintiff") will
7 move the Court for an Order granting approval of settlement of Labor Code Section 2698, *et*
8 *seq.*, Private Attorneys General Act Claims.

9 This motion will be based on this Notice, Plaintiff's Memorandum of Points And
10 Authorities, along with the Declaration of Hallie Von Rock, filed concurrently herewith, the
11 records and files in this action, and any other further evidence or argument that the Court may
12 properly receive at or before the hearing.

13
14 Dated: August 15, 2023

AIMAN-SMITH & MARCY
A PROFESSIONAL CORPORATION

15 /s/ Hallie Von Rock

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17 Hallie Von Rock
18 Attorneys for Plaintiffs
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