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on behalf of himself and all others similarly situated

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

DESTINY HENDERSON-HUDGINS and
EDWIN RODRIGUEZ HERNANDEZ,
individually and on behalf all others similarly
situated,

Plaintiffs,

v.

BUBBA GUMP SHRIMP CO. RESTAURANTS,
INC., a Delaware Corporation; LANDRY'S
PAYROLL, INC., a Texas Corporation; and
DOES 1-50, inclusive,

Defendants.

Case No.: 21CV002050

Assigned for All Purposes:
Hon. Carrie M. Panetta
Dept. 14

**NOTICE OF MOTION AND
MOTION FOR APPROVAL OF
PAGA SETTLEMENT AGREEMENT**

Date: October 17, 2025
Time: 8:30 a.m.
Dept: 14

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

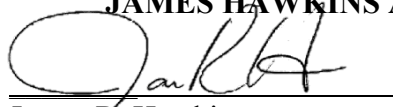
1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2
3 **PLEASE TAKE NOTICE** that on October 17, 2025 at 8:30 a.m. in Department 14 of the
4 Monterey County Superior Court, 1200 Aguajito Road, Monterey, CA 93940, Plaintiffs Destiny
5 Henderson-Hudgins and Edwin Rodriguez Hernandez ("Plaintiffs") will, and hereby does, move this
6 Court for: (1) an Order approving the Parties' PAGA Settlement Agreement ("Settlement") (attached
7 as **Exhibit 1** to the Declaration of James R. Hawkins, submitted concurrently herewith) and ordering
8 the Parties to carry out the terms of the Settlement; and (2) entry of a final Judgment thereon.

9 This Motion will be based on this notice, the attached memorandum of points and authorities
10 filed contemporaneously herewith, the Parties' PAGA Settlement Agreement, the Declarations of
11 James R. Hawkins and Plaintiff Destiny Henderson-Hudgins, as well as upon the pleadings,
12 documents, memoranda, and other records on file with the Court in this matter, and upon such other
13 and further oral and/or documentary evidence as may be properly presented at the hearing on this
14 matter.

15 Pursuant to California Labor Code § 2699(1)(2), a copy of the Settlement Agreement was filed
16 with the LWDA on September 10, 2025 (Declaration of James R. Hawkins, **Exhibit 3.**)

17 DATED: September 10, 2025

18 **JAMES HAWKINS APLC**
19 By: 
20 James R. Hawkins
Christina M. Lucio

21 Attorneys for Plaintiff
22 Destiny Henderson-Hudgins on behalf of
23 herself and in her representative capacity as
24 private attorney general

25 **CAPSTONE LAW APC**

26 /s/ Robert Drexler
27 Robert Drexler

28 Attorneys for Plaintiff
EDWIN RODRIGUEZ HERNANDEZ
on behalf of himself and in his representative
capacity as private attorney general