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10 Attorneys for Plaintiffs JOSE ANGEL CASTELLANOS, GABRIEL CARRANZA,
11 and ULISES CEJA MARTINEZ

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13 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
14 IN AND FOR THE COUNTY OF SANTA CLARA
15 UNLIMITED JURISDICTION, COMPLEX
16

17 JOSE ANGEL CASTELLANOS, GABRIEL
18 CARRANZA, and ULISES CEJA
19 MARTINEZ,

20 Plaintiffs,

21 v.

22 STARZ TELECOM, INC.; SAMMY DEAN
23 WILBUR ISAACSON; JOSHUA MICHAEL
24 WAYN ISAACSON AND DOES 1
25 THROUGH 50,

26 Defendants.

Case No. 21CV386437

**PLAINTIFFS' MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

Date: TBD

Time: TBD

Courtroom:

Complaint Filed: August 2, 2021
Hon. Patricia Lucas

27 TO ALL PARTIES WHO HAVE MADE AN APPEARANCE IN THIS ACTION:

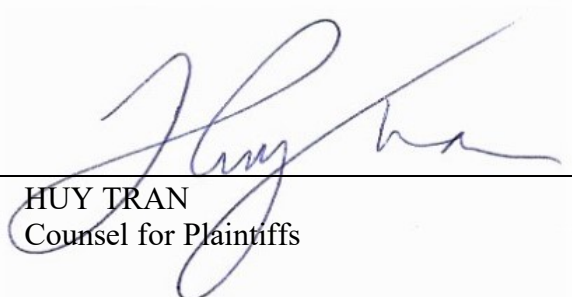
28 PLEASE TAKE NOTICE that Plaintiffs JOSE ANGEL CASTELLANOS, GABRIEL
CARRANZA, and ULISES CEJA MARTINEZ hereby move for an Order pursuant to Labor Code
section 2699(1)(2) approving penalties sought as part of a settlement pursuant to Labor Code section
2698, et seq. (the Private Attorneys General Act of 2004 "PAGA"). Specifically, Plaintiffs move for
an Order approving the distribution of the Settlement, including amounts to Plaintiffs in settlement

1 of their individual claims and the amount of the Settlement allocated to the PAGA workforce and
2 the California Labor & Workforce Development Agency (“LWDA”); amount to paid to the
3 Settlement Administrator; and an amount to be paid to Plaintiffs’ Counsel for their reasonable
4 attorneys’ fees and litigation costs.

5 This Motion is based upon this Notice of Motion and Motion, the Memorandum of Points
6 and Authorities in support thereof, the Declaration of Huy Tran and the exhibit attached thereto, and
7 any additional papers or arguments submitted on or before the hearing of the Motion.
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10 Date: December 12, 2022

By: _____


HUY TRAN
Counsel for Plaintiffs