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Attorneys for Plaintiff MARIA TABAREZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

MARIA TABAREZ, on behalf of the State of
California, as a private attorney general,

Plaintiff,

v.

ALTA HOSPITALS SYSTEM, LLC, a
California Limited Liability Company; DOES
1-50, Inclusive,

Defendants

Case No: 21SMCV01379

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

Date: December 18, 2024

Time: 8:30am

Reservation ID: 878949144033

Judge: Michael E. Whitaker

Dept: 207

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

2 YOU ARE HEREBY NOTIFIED THAT on December 18, 2024, at 8:30a.m. or as soon as
3 this matter may be heard in Department 207 of the above-entitled Court before the Honorable Judge
4 Michael E. Whitaker, Plaintiff Maria Tabarez ("Plaintiff") will apply for an order approving the
5 California Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor
6 Code §2699(1). The proposed settlement is set forth in the accompanying PAGA Settlement
7 Agreement (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 Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Declaration of Nicholas De Blouw Esq., the Declaration of the Plaintiff Maria Tabarez, the
11 Declaration of the Settlement Administrator, the Settlement Agreement between the parties, and the
12 complete files and records in this action. All parties have approved the Settlement Agreement and
13 have met and conferred regarding the motion; therefore, this motion is not opposed by Defendant.
14 The Labor Workforce Development Agency has been served with this motion and the Settlement
15 Agreement as set forth in the accompanying Declaration of Jean-Claude Lapuyade, Esq. As this
16 Motion is unopposed, the Parties respectfully request relief from the page limit requirement set by
17 California Rules of Court, Rule 3.1113(d).

18 DATED: November 21, 2024

JCL LAW FIRM, APC

19
20 By: 

Jean-Claude Lapuyade, Esq.
Attorney for Plaintiff



Court Reservation Receipt

Reservation

Reservation ID: 878949144033	Status: RESERVED
Reservation Type: Motion re: (NOTICE OF MOTION AND MOTION TO APPROVE PAGA SETTLEMENT)	Number of Motions: 1
Case Number: 21SMCV01379	Case Title: MARIA TABAREZ vs ALTA HOSPITALS SYSTEM, LL
Filing Party: Maria Tabarez (Plaintiff)	Location: Beverly Hills Courthouse - Department 207
Date/Time: December 18th 2024, 8:30AM	Confirmation Code: CR-WMDXFQCBJBAKBY5IL

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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