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Attorneys for Plaintiff ANDY PEREZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF ALAMEDA**

ANDY PEREZ, individually, and on behalf of  
other aggrieved employees pursuant to the  
California Private Attorneys General Act;

Plaintiff,

vs.

CURTISS-WRIGHT CORPORATION, an  
unknown business entity; and DOES 1 through  
100, inclusive;

Defendants.

Case No: RG21109747

**NOTICE OF MOTION TO APPROVE  
PAGA SETTLEMENT**

Date: September 19, 2025

Time: 9:30 a.m.

Reservation ID: 095930799663

Judge: Hon. Victoria Kolakowski  
Dept.: 16

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

2 YOU ARE HEREBY NOTIFIED THAT on September 16, 2025 at 2:30 p.m. or as soon as  
3 this matter may be heard in Courtroom A of the above-entitled Court before the Honorable Judge  
4 Victoria Kolakowski, Plaintiff Andy Perez (“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(s). The proposed settlement is set forth in the accompanying Private Attorneys General  
7 Act Settlement Agreement and Release (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 Vartan Madoyan, Esq., the Declaration of the Plaintiff, the Declaration of the  
11 Settlement Administrator, the Settlement Agreement between the parties, and the complete files and  
12 records in this action. All parties have approved the Settlement Agreement and have met and  
13 conferred regarding the motion; therefore, this motion is not opposed by Defendant. The Labor  
14 Workforce Development Agency has been served with this motion and the Settlement Agreement as  
15 set forth in the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed,  
16 the Parties respectfully request relief from the page limit requirement set by California Rules of Court,  
17 Rule 3.1113(d).

18 DATED: April 24, 2025

**ZAKAY LAW GROUP, APLC**

20 By: \_\_\_\_\_

21 Jaclyn Joyce, Esq.  
22 Attorney for Plaintiff



# Superior Court of Alameda County Public Portal

## Court Reservation Receipt

### Reservation

Reservation ID:  
095930799663

Status:  
RESERVED

Reservation Type:  
Motion re: (MOTION TO APPROVE PAGA  
SETTLEMENT)

Number of Motions:  
1

Case Number:  
RG21109747

Case Title:  
Perez VS Curtiss-Wright Corporation

Filing Party:  
Andy Perez (Plaintiff)

Location:  
Rene C. Davidson Courthouse - Department 16

Date/Time:  
September 16th 2025, 2:30PM

Confirmation Code:  
CR-GFT5LBXHQQEBCGNGW

### Fees

| Description                 | Fee  | Qty | Amount |
|-----------------------------|------|-----|--------|
| Motion re: (name extension) | .00  | 1   | .00    |
| Court Technology Fee        | 1.00 | 1   | 1.00   |
| TOTAL                       |      |     | \$1.00 |

### Payment

Amount:  
\$1.00

Type:  
Visa

Account Number:  
XXXX9291

Authorization:  
00129G

Payment Date:  
2025-04-17

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