

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
James@Jameshawkinsaplc.com
Christina@Jameshawkinsaplc.com

Attorneys for Plaintiff JERRY VELYNES
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF FRESNO

JERRY VELYNES, individually and on
behalf of himself and all others similarly
situated,

Plaintiff

v.

VOLT MANAGEMENT CORP., a
Delaware corporation; GUSMER
ENTERPRISES, INC., a New Jersey
corporation; GXO LOGISTICS SUPPLY
CHAIN, INC., a North Carolina
Corporation; and DOES 1-50, inclusive,

Defendant.

Case No. 22CECG01885

Assigned for All Purposes To:
Hon. Kristi Culver Kapetan
Dept.: 502

**PLAINTIFF'S UNOPPOSED NOTICE OF
MOTION TO APPROVE THE SETTLEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

*[filed concurrently with the Declaration of PAGA
Counsel James Hawkins, the Declaration of Plaintiff
Jerry Velyines, the PAGA Settlement Agreement, the
proposed Order Granting Approval of Settlement]*

Date: October 15, 2026
Time: 3:30p.m.
Dept: 501

Complaint Filed: November 2, 2021
Trial Date: None Set

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

2 **PLEASE TAKE NOTICE** that on October 15, 2026 , at 3:30p.m., or as soon thereafter as the
3 matter may be heard in Department 502 of the Superior Court of the State of California, County of Fresno,
4 located at the B.F. Sisk Courthouse, 1130 O Street, Fresno, CA 93721, before the Honorable Kristi Culver
5 Kapetan, Plaintiff Jerry Velyines will, and hereby does, move the Court for (1) an Order approving the
6 Parties' Settlement Agreement pursuant to the Private Attorneys General Act of 2004, Labor Code §
7 2698, *et seq.* ("PAGA") ("Settlement") (attached as **Exhibit 1** to the Declaration of James R. Hawkins,
8 submitted concurrently herewith) and ordering the Parties to carry out the terms of the Settlement; and
9 (2) and entry of a final Judgment thereon.

10 This unopposed motion seeks approval of a non-reversionary \$170,000 settlement reached after
11 mediation, which resolves all PAGA claims alleged in this action on behalf of two groups of non-exempt
12 employees who worked for Defendants in California during the relevant PAGA period. The settlement
13 allocates:

- 14 • 75% (presently estimated to be \$69,252.04) to the Labor and Workforce Development
15 Agency,
- 16 • 25% (presently estimated to be \$23,084.02) to the Aggrieved Employees, distributed pro
17 rata based on pay periods worked,
- 18 • Attorneys' fees of up to \$56,666.67, and \$9,147.27 in litigation costs,
- 19 • Service award of \$5,000 to Plaintiff Velyines and,
- 20 • Up to \$6,850.00 in administration costs.

21 This motion is based on the Memorandum of Points and Authorities, the Declaration of PAGA
22 Counsel James Hawkins, the Declaration of Plaintiff Jerry Velyines, the PAGA Settlement Agreement,
23 the proposed Order Granting Approval of Settlement, all pleadings and papers on file, and any argument
24 or evidence presented at the hearing.

25 ///

26 ///

27 ///

Pursuant to California Labor Code § 2699(l)(2), a copy of the Settlement Agreement was filed with the LWDA on May 20, 2026 (See, Declaration of James R. Hawkins, **Exhibit 10.**)

Dated: May 21, 2026

JAMES HAWKINS, APLC

By: _____

James. R. Hawkins, Esq.

Christina Lucio, Esq.

Attorneys for Plaintiff and the Aggrieved Employees