

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
Email: james@jameshawkinsaplc.com
Email: christina@jameshawkinsaplc.com

Attorneys for Plaintiff JORGE GARCIA
on behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – INGLEWOOD COURTHOUSE

JORGE GARCIA, individually and on behalf
of himself and all others similarly situated,

Plaintiff,

v.

US BEST INGREDIENTS, INC., a
California Corporation; and DOES 1-50,
inclusive,

Defendants.

CASE NO.: 21TRCV00813

**PLAINTIFF JORGE GARCIA'S NOTICE
OF MOTION AND MOTION FOR PAGA
APPROVAL**

Dept.: 8
Judge: Hon. Ronald F. Frank
Date: June 14, 2023
Time: 8:30a.m.

RES ID: 559232291149

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

2 PLEASE TAKE NOTICE that on June 14, 2023, at 8:30 a.m., in Department 8, 5th floor,
3 of the County of Los Angeles Superior Court, located at the Inglewood Courthouse, 1 Regent
4 Street, Inglewood, California 90301, plaintiff Jorge Garcia will, and hereby does, move this Court
5 for entry of an Order as follows:

- 6 1. Granting approval approving pursuant to Labor Code section 2699 of the parties'
7 proposed Settlement Agreement of claims brought by Plaintiff pursuant to the Private
8 Attorneys General Act of 2004, California Labor Code section 2698 et seq. and
9 entering judgment;
- 10 2. Appointing Apex Class Action LLC as the third party Settlement Administrator, and
11 approving an award of reasonable administration expenses, estimated not to exceed
12 \$6,000;
- 13 3. Approving as to form and content the proposed Notice of PAGA Settlement and
14 Release of Claims, and directing that it be distributed to the Aggrieved Employees
15 pursuant to the terms of the Settlement Agreement;
- 16 4. Directing the distribution of the Total Settlement Payment (\$225,000.00) pursuant to
17 the terms of the Settlement Agreement;
- 18 5. Approving an award of one-third of the Total Settlement Amount (\$75,000.00) in
19 attorneys' fees to Plaintiff's Counsel;
- 20 6. Approving an award of \$9,088.62 in actual litigation costs reimbursement to
21 Plaintiff's Counsel; and
- 22 7. Approving the payment of \$101,183.24 to the California Labor & Workforce
23 Development Agency for its 75% share of PAGA civil penalties.

24 The motion will be based upon this notice, the attached Memorandum of Points and
25 Authorities, the Declaration of Christina M. Lucio, Jorge Garcia, and all exhibits thereto, the
26 complete files and records of this case, and any other evidence or oral argument which may be
27 considered by the Court at the time of the hearing.

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DATED: May 17, 2023

JAMES HAWKINS APLC

By: 
JAMES R. HAWKINS
CHRISTINA M. LUCIO
Attorneys for Plaintiff Jorge Garcia, individually
and on behalf of all others similarly situated



Make a Reservation

JORGE GARCIA, INDIVIDUALLY AND ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED vs US BEST INGREDIENTS, INC., A CALIFORNIA CORPORATION

Case Number: 21TRCV00813 Case Type: Civil Unlimited Category: Other Employment Complaint Case
Date Filed: 2021-11-03 Location: Inglewood Courthouse - Department 8

Reservation

Case Name:

JORGE GARCIA, INDIVIDUALLY AND ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED vs US BEST INGREDIENTS, INC., A CALIFORNIA CORPORATION

Case Number:

21TRCV00813

Type:

Motion re: (Motion for PAGA Approval)

Status:

RESERVED

Filing Party:

JORGE GARCIA, individually and on behalf of himself and all others similarly situated (Plaintiff)

Location:

Inglewood Courthouse - Department 8

Date/Time:

06/14/2023 8:30 AM

Number of Motions:

1

Reservation ID:

559232291149

Confirmation Code:

CR-FMY8C5TMEXZJVAPPX

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65

Chat

Description	Fee	Qty	Amount
TOTAL			\$61.65

Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX6358	Authorization: 05102D
Payment Date: 1969-12-31	

 Print Receipt

 [Reserve Another Hearing](#)