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9
10 Attorneys for Plaintiff ERICK TORRES,
on behalf of himself and all others similarly situated

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SAN BERNARDINO**
14

15 ERICK TORRES, on behalf of himself and all
16 others similarly situated,

17 Plaintiff,

18 v.

19 BECHTEL INFRASTRUCTURE AND
POWER CONSTRUCTION SERVICES, INC.,
a Delaware corporation, and DOES 1-50,
20 inclusive,

21 Defendants.
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Case No. CIVSB2134046

Assigned for All Purposes To:
Hon. Christian Towns
Dept.: S-26

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR APPROVAL OF
SETTLEMENT PURSUANT TO THE
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT OF 2004 (LAB. CODE §§
2698 ET SEQ.)**

Date: March 19, 2025
Time: 8:30 a.m.
Dept.: S-26

Complaint Filed: November 23, 2021
CMC: January 6, 2025
Trial: Not Set

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

2 PLEASE TAKE NOTICE that on March 19, 2025, at 8:30 a.m., in Department S-26 of the
3 San Bernardino Superior Court, located at 247 Third Street, San Bernardino, California 92415,
4 Plaintiff Erick Torres will, and hereby does, move this Court for entry of an order and judgment
5 approving the parties' PAGA settlement pursuant to the Private Attorneys General Act (Labor Code
6 section 2698 *et seq.*). The PAGA Settlement and Release Agreement which the Parties request the
7 Court to approve is attached as **Exhibit 1** to the Declaration of Christina M. Lucio.

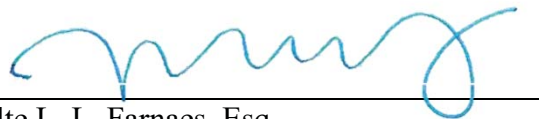
8 **Notice to the LWDA:** On December 10, 2024, PAGA Counsel filed the settlement
9 agreement with the LWDA. (See, **Exhibit 4** to the Lucio Declaration.)

10 The motion will be based upon this notice, the attached Memorandum of Points and
11 Authorities, the Declarations of Christina M. Lucio, James R. Hawkins, Erick Torres, Anthony
12 Roger, and all exhibits thereto, the complete files and records of this case, and any other evidence
13 or oral argument which may be considered by the Court at the time of the hearing.

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15 Dated: December 10, 2024

FARNAES & LUCIO, APC

16
17 By:

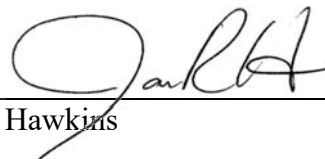


18 _____
19 Malte L. L. Farnaes, Esq.
Christina M. Lucio, Esq.

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21 Dated: December 10, 2024

JAMES HAWKINS, APLC

22
23 By:



24 _____
25 James R. Hawkins

26 Attorneys for Plaintiff Erick Torres, on
27 behalf of himself and the Aggrieved
28 Employees.

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On December 10, 2024, I served on the interested parties in this action the following document(s) entitled:

- ## PROOF OF SERVICE

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address Nicole@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

SERVICE LIST

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Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act>

[XX] **STATE:** I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on December 10, 2024, at Irvine, California


Nicole Miccolis