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Attorneys for Plaintiff ELVA FLORES, in a Representative capacity only, and on behalf of other members of the general public similarly situated

[Additional Counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

ELVA FLORES and MEGAN DREMIN, in
a Representative capacity only, and on behalf
of other members of the general public
similarly situated

Plaintiff

v.

RANCHO VALENCIA RESORT
PARTNERS, LLC., a California Limited
Liability Company, and RVR RANCHO
VALENCIA HOLDINGS PARTNERS, L.P.,
and DOES 1-10, inclusive

Defendants

CASE NO. 37-2022-00006752-CU-OE-CTL

**PLAINTIFFS' NOTICE OF UNOPPOSED
EX PARTE APPLICATION FOR PAGA
SETTLEMENT APPROVAL**

Date: October 23, 2025

Time: 8:30 a.m.

Dept.: C-68

Judge: Hon. Richard S. Whitney

1 Arby Aiwazian [CSB No. 269827]

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4 **LAWYERS FOR JUSTICE**

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6 Attorneys for MEGAN DREMIN, in a Representative capacity only, and on behalf of other members
7 of the general public similarly situated

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1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on October 23, 2025, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard in Department C-68 of the San Diego Superior Court, 330 West Broadway, San
4 Diego, CA 92101, the Honorable Richard S. Whitney presiding, Plaintiff ELVA FLORES, in a
5 Representative capacity only, and on behalf of other members of the general public similarly situated,
6 seeks an order from the Court approving of the PAGA settlement.

7 This motion is based on this Notice, Memorandum of Points and Authorities in support thereof,
8 and the Declaration of Ryan T. Kuhn and Declaration of Elva Flores, and attached exhibits.

9 Copies of this motion and all other papers filed herewith will be served on the following
10 attorneys of record electronically concurrent with the filing of this application with the Court:

11 Derek Paradis
12 Ed Boniske
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20 Attorneys for Plaintiff MEGAN DREMIN

21 Dated: October 21, 2025

SULLIVAN & YAECKEL LAW GROUP, APC

22
23 *Ryan Kuhn*

24 Eric K. Yaeckel

25 Ryan T. Kuhn

26 Cody D. Archer

27 Attorneys for Plaintiff ELVA FLORES in a
28 Representative capacity only, and on behalf of other
members of the general public similarly situated