

1 Daniel V. Santiago (SBN 206532)
2 LAW OFFICES OF DANIEL V. SANTIAGO, P.C.
3 355 South Grand Avenue, Suite 2450
4 Los Angeles, California 90071
5 Phone: (760) 652-9801
6 Facsimile: (760) 652-9802
7 E-mail: dvs@dvslawoffices.com
8 Attorney for the Plaintiff, Cecelia A. Rabaya

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE**

CECILIA A. RABAYA, individually, on behalf
of all others similarly situated, and as
representative of the State of California on behalf
of all aggrieved employees,

Plaintiff,

v.

MABUHAY INTERNATIONAL SERVICES,
INC., a Nevada corporation, JULIET M.
BOXALL, an individual, and DOES 1 through
20, inclusive,

Defendants.

Case No. 21STCV47596

**NOTICE OF PLAINTIFF'S UNOPPOSED
MOTION AND PLAINTIFF'S
UNOPPOSED MOTION FOR AN
ORDER: (1) APPROVING THE
SETTLEMENT OF PLAINTIFF'S PAGA
CLAIMS ON BEHALF OF HERSELF
AND DISMISSING THOSE CLAIMS
WITH PREJUDICE; (2) DISMISSING
PLAINTIFF'S PAGA CLAIMS ON
BEHALF OF THE OTHER ALLEGEDLY
AGGRIEVED EMPLOYEES WITHOUT
PREJUDICE; AND (3) DISMISSING
PLAINTIFF'S PUTATIVE CLASS
ACTION CLAIMS WITHOUT
PREJUDICE; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION (filed under
separate cover); DECLARATION OF
DANIEL V. SANTIAGO IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover); and
[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover).**

Judge: The Honorable Carolyn B. Kuhl
Department: 12
Complaint Filed: December 30, 2021

1 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that the Plaintiff, Cecelia A. Rabaya, by and through her
3 undersigned counsel, will appear on August 3, 2022, at 1:45 p.m. before the Honorable Judge
4 Carolyn B. Kuhl in Department 12 of the Superior Court of California, County of Los Angeles,
5 Spring Street Courthouse, located at 312 N. Spring St., Los Angeles, California 90012, and move,
6 and hereby moves, without opposition by the Defendants, Mabuhay International Services, Inc. and
7 Juliet M. Boxall, for an Order: (1) approving the settlement of Plaintiff's PAGA claims against the
8 Defendants on behalf of herself and dismissing those claims with prejudice; (2) dismissing
9 Plaintiff's PAGA claims against the Defendants on behalf of other aggrieved employees without
10 prejudice; and (3) dismissing Plaintiff's putative class action claims against the Defendants without
11 prejudice.

12 PLEASE TAKE FURTHER NOTICE that this Unopposed Motion is supported by, *inter*
13 *alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under separate
14 cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover;
15 (3) the [Proposed] Order filed concurrently herewith under separate cover; and (4) any additional
16 information provided and/or arguments made at the hearing on this Unopposed Motion.

17 Dated: June 27, 2022

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

18 By:


Daniel V. Santiago, Esq.
Attorney for Plaintiff, Cecelia A. Rabaya