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7 **WILLIAM J. GORHAM III**  
8 **CA State Bar No. 151773**  
9 **VLADIMIR J. KOZINA**  
10 **CA State Bar No. 284645**

11 **Attorneys for Plaintiff, David Clark**

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF CONTRA COSTA – UNLIMITED JURISDICTION**

14 **DAVID CLARK,**

15 **Plaintiff,**

16 **vs.**

17 **CUATRO AMIGOS, INC., dba AJ**  
18 **BONO PLUMBING; and DOES 1-100,**  
19 **inclusive,**

20 **Defendants.**

**CASE NO: C22-00727**

**NOTICE OF MOTION AND MOTION TO**  
**APPROVE PAGA SETTLEMENT**

**Date:**  
**Time:**  
**Dept.:**

21 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

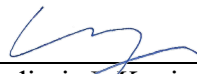
22 PLEASE TAKE NOTICE that on \_\_\_\_\_, 2024 at \_\_\_\_\_ in Department \_\_\_\_ of  
23 the above-captioned Court, located at Wakefield Taylor Courthouse, 725 Court Street, Martinez,  
24 California 94553, or as soon thereafter as this matter may be heard, Plaintiff David Clark  
25 (“Plaintiff”) will and hereby does move pursuant to Labor Code section 2699(1)(2) for approval of  
26 the settlement reached between Plaintiff and Defendant Cuatro Amigos, Inc. dba AJ Bono  
27 Plumbing (“Defendant”), of Plaintiff’s claims under the Labor Code Private Attorneys General Act  
28 of 2004 (“PAGA”), set forth as the Ninth Cause of Action to Plaintiff’s First Amended Complaint  
filed with this Court. Defendant does not oppose the instant Motion.

This motion shall be based on this Notice of Motion, Plaintiff’s Memorandum of Points and

1 Authorities in Support, the Declaration of Vladimir J. Kozina, the Proposed Order Approving  
2 PAGA Settlement, all filed concurrently herewith, and upon such other and further evidence and  
3 argument as may be presented at the hearing on this motion.

4  
5 DATED: May 10, 2024

MAYALL HURLEY, P.C.

6  
7 By: 

8 Vladimir J. Kozina  
9 Attorneys for Plaintiff  
10 DAVID CLARK  
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