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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**
10 **UNLIMITED JURISDICTION**

11 NOEL VAN WAGNER, an individual; and
12 VERONICA ANDRADE, an individual,

13 Plaintiffs,

14 v.

15 WESTLAKE PROPERTIES, INC.; and DOES
16 1-25, inclusive,

17 Defendants.

Case No. 22STCV16191

Reservation ID: 129294190385

Assigned for all purposes to Hon. Teresa A.
Beaudet, Dept. 50

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF SETTLEMENT OF
LABOR CODE §2698, et seq. PRIVATE
ATTORNEYS GENERAL ACT (“PAGA”)
CLAIMS**

18 Date: November 4, 2025
19 Time: 2:00 p.m.
20 Dept.: 50

21 TO DEFENDANT WESTLAKE PROPERTIES, INC., THE LABOR AND
22 WORKFORCE DEVELOPMENT AGENCY, AND THEIR ATTORNEYS OF RECORD:

23 Please take notice that on November 4, 2025, at 2:00 p.m., or as soon thereafter as the
24 matter may be heard, in Department 50 of the Stanley Mosk Courthouse of the Los Angeles
25 County Superior Court, located at 111 North Hill Street, Los Angeles, CA 90012 or via remote
26 hearing pursuant to the Court’s rules, Plaintiffs Noel Van Wagner and Veronica Andrade will and
27 hereby do move for an order approving the settlement of this case pursuant to Labor Code §2698,
28 *et seq.*

1 This Motion is based on this Notice, the accompanying Memorandum of Points and
2 Authorities, the Declaration of John Lofton, all pleading and papers on file in this matter, any oral
3 argument or other evidence presented at the hearing on this matter, and any other evidence that the
4 Court may wish to consider.

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6 DATED: October 9, 2024

AIMAN-SMITH & MARCY, P.C.

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9 John A. Lofton, Esq.
10 Attorney for Plaintiffs Noel Van Wagner and
11 Veronica Andrade
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