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

10 ALEJANDRO JIMENEZ, as an individual on
behalf of himself and all other similarly
11 situated,

Plaintiff,

12 v.

13 GOLDEN STAR TECHNOLOGY, INC., a
California corporation; DENNIS WANG, an
14 individual; and DOES 1 through 50, inclusive,

15 Defendants.

Case No.: 22STCV21510

Assigned to Hon. Stuart M. Rice, Dept. 1

**NOTICE OF UNOPPOSED MOTION FOR AN
ORDER APPROVING SETTLEMENT OF
CLAIMS BROUGHT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT OF
2004 AND REQUEST FOR AWARD OF
ATTORNEYS' FEES, COSTS, SERVICE
AWARD, AND SETTLEMENT
ADMINISTRATION EXPENSES**

Date: July 19, 2024

Time: 10:30 a.m.

Dept: 1

Judge: Hon. Stuart M. Rice

*[Memorandum of Points and Authorities; the
Declarations of Graham S.P. Hollis and Alejandro
Jimenez; and [Proposed] Order are filed
concurrently herewith]*

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on July 19, 2024 at 10:30 a.m., in Department 1 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, CA 90012, Plaintiff Alejandro Jimenez (“Plaintiff”), will and hereby does, move unopposed for an Order: (1) granting the approval of the proposed settlement of claims brought under the California Labor Code’s Private Attorneys General Act of 2004 (Labor Code § 2698 et seq.) (“PAGA”) set forth in the parties’ PAGA Settlement Agreement (“Settlement” or “Settlement Agreement”), which is attached as Exhibit 1 to the Declaration of Graham S.P. Hollis; (2) directing payment of attorneys’ fees in the amount of \$39,900 and litigation costs in the amount of \$7,016.90 from the Gross Settlement Amount to Plaintiff’s counsel; (2) directing payment of a Service Award to Plaintiff in the amount of \$1,000 from the Gross Settlement Amount; (3) appointing ILYM Group, Inc. as the Settlement Administrator and approving payment of its fees not to exceed \$5,000 from the Gross Settlement Amount; (4) directing disbursement of the Net Settlement Amount (the amount remaining of the Gross Settlement Amount following these deductions) pursuant to the terms of the Settlement Agreement; and (5) dismissing this action with prejudice.

Plaintiff’s Motion is made pursuant to California Labor Code section 2699(l)(2) on the grounds that the Settlement was reached as a result of informed arm’s-length negotiations, is fair, reasonable and adequate, and is deserving of approval for the benefit of the State of California, the general public, and the aggrieved employees. In accordance with Labor Code section 2699(l)(2), a copy of the parties’ Settlement Agreement has been submitted to the California Labor and Workforce Development Agency concurrently with the filing of Plaintiff’s Motion.

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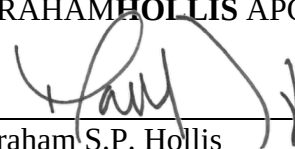
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1 This Motion is based upon this Notice; the accompanying Memorandum of Points and Authorities;
2 the Settlement Agreement; the declarations of Graham S.P. Hollis and Plaintiff Alejandro Jimenez and
3 any exhibits thereto; all pleadings and papers filed in the above-entitled action; and upon any other such
4 evidence and oral argument that may be presented to the Court at the time of the hearing.

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6 Dated: June 26, 2024

GRAHAM HOLLIS APC

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8 By: 

Graham S.P. Hollis
Dawn M. Berry
Attorneys For Plaintiff Alejandro Jimenez