

1 GRAHAMHOLLIS APC
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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,

12 Plaintiff,

13 v.

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

15 Defendants.
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Case No.: 22STCV21510

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

**NOTICE OF UNOPPOSED REVISED
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: August 28, 2024

Time: 10:30 a.m.

Dept: 1

Judge: Hon. Stuart M. Rice

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

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on August 28, 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 \$37,999.62 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 revised 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 revised Motion.

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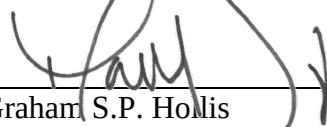
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1 This revised Motion is based upon this Notice; the accompanying Memorandum of Points and
2 Authorities; the Settlement Agreement; the declaration of Graham S.P. Hollis and any exhibits thereto,
3 the declaration of Alejandro Jimenez filed on June 26, 2024; all pleadings and papers filed in the above-
4 entitled action; and upon any other such evidence and oral argument that may be presented to the Court at
5 the time of the hearing.

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7 Dated: August 2, 2024

GRAHAM HOLLIS APC

8
9 By: 

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