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Attorneys for Plaintiff CHIDINMA OLISAEMEKA

(Additional Counsel on Next Page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CHIDINMA OLISAEMEKA, individually, and
on behalf of other members of the general
public similarly situated,

Plaintiff,

v.

LYNWOOD HEALTHCARE CENTER, an
unknown business entity; LYNWOOD POST
ACUTE CARE CENTER, an unknown
business entity; AG LYNWOOD, LLC, a
California limited liability company; and DOES
1 through 100, inclusive,

Defendants.

Lead Case No. 22STCV13175

Consolidated Case No. 22CMCV00121

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

Date: February 26, 2025

Time: 10:00am

Moving Papers Due by: January 27, 2025

Opposition Due by: February 6, 2025

Reply Papers Due by: February 13, 2025

Judge: Hon. Elaine Lu

Dept: 9

1 **LAWYERS FOR JUSTICE, PC**

2 Margaux Gundzik, Esq.

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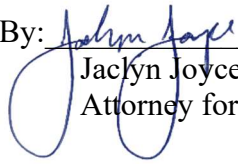
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on February 26, 2025, at 10:00 a.m. or as soon as
3 this matter may be heard in Courtroom 9 of the above-entitled Court before the Honorable Judge
4 Elaine Lu, Plaintiff CHIDINMA OLISAEMEKA ("Plaintiff") will apply for an order approving the
5 California Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with
6 Labor Code §2699(s). The proposed settlement is set forth in the accompanying PAGA Settlement
7 Agreement (the "Settlement Agreement").

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Declaration of Tata Zabehi, the Declaration of the Plaintiff, the Declaration of the Settlement
11 Administrator, the Settlement Agreement between the parties, and the complete files and records in
12 this action. All parties have approved the Settlement Agreement and have met and conferred
13 regarding the motion; therefore, this motion is not opposed by Defendant. The Labor Workforce
14 Development Agency has been served with this motion and the Settlement Agreement as set forth in
15 the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed, the Parties
16 respectfully request relief from the page limit requirement set by California Rules of Court, Rule
17 3.1113(d).

18 DATED: January 7, 2025

ZAKAY LAW GROUP, APLC

20 By: 
21 Jacklyn Joyce, Esq.
22 Attorney for Plaintiff