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Attorneys for Plaintiffs

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LY HAI, on behalf of himself, those similarly
situated, and/or aggrieved California-based
nonexempt employees,

Plaintiff,
vs.

SUNROAD HS AUTO, INC., AND DOES 1
THROUGH 100, INCLUSIVE,

Defendant.

Case No: 37-2022-00025788-CU-OE-CTL

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: March 28, 2025

Time: 9:10 a.m.

Judge: Hon. Judy S. Bae

Dept: C-62

1 **BLACKSTONE LAW, APC**

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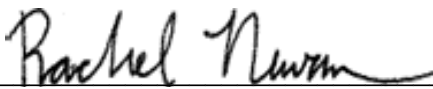
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on March 28, 2025, at 9:10 a.m. or as soon as this
3 matter may be heard in Courtroom 62 of the above-entitled Court before the Honorable Judge Judy
4 S. Bae, Plaintiffs Ly Hai, Tyler Wayne Sneed, Mohammad Tahbaz, Shawn Farden, Jorge Aguirre,
5 Roman Mayne, and Christianna Yousif ("Plaintiffs") will apply for an order approving the California
6 Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor Code
7 §2699(l). The proposed settlement is set forth in the accompanying PAGA Settlement Agreement
8 (the "Settlement Agreement").

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

19 DATED: March 6, 2025

ZAKAY LAW GROUP, APLC

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21 By: 
22 Rachel Newman, Esq.
23 Attorney for Plaintiffs
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