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Attorneys for Plaintiff JONATHAN KHODRA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

JONATHAN KHODRA, on behalf of himself
and on behalf of all persons similarly situated,

Plaintiff,

v.

JHK HOSPITALITY, LLC, a Limited Liability
Company (dba La Quinta Inn & Suites by
Wyndham); and DOES 1-50, Inclusive,

Defendants.

Case No: 20STCV15655

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

Hearing Date: October 1, 2021

Hearing Time: 8:30 AM

Reservation ID: 243018701512

Honorable Judge Richard J. Burdge

Department 37

Trial Date: None

Action Filed: April 22, 2020

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

2 YOU ARE HEREBY NOTIFIED THAT on October 1, 2021 at 8:30 a.m., or as soon
3 thereafter as the matter can be heard, in Department 37 of the above-entitled Court, before the
4 Honorable Judge Richard J. Burdge, Plaintiff JONATHAN KHODRA (“Plaintiff”) will apply for
5 an order approving the PAGA settlement in accordance with Labor Code §2699(l). The proposed
6 settlement is set forth in the accompanying Private Attorney General Act (Labor Code Section
7 2698 *et seq.*) Settlement Agreement and Limited Release (the “Agreement”).

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

16 DATED: September 8, 2021

ZAKAY LAW GROUP, APLC

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18 By: 
19 Shani O. Zakay
20 Attorneys for Plaintiff
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