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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MERCED

GUILLERMINA FUENTES, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

v.

CASTLE FAMILY HEALTH CENTERS,
INC., a California corporation; and DOES 1
through 100, inclusive;

Defendants

Case No: 22CV-02080

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: December 4, 2025

Time: 8:15 a.m.

Judge: Hon. Stephanie L. Jamieson

Dept.: 8

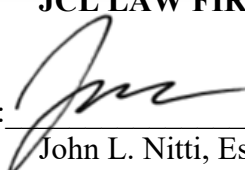
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on **December 4, 2025**, at **8:15 a.m.** or as soon as
3 this matter may be heard in Courtroom 8 of the above-entitled Court before the Honorable Judge
4 Brian L. McCabe, Plaintiff GUILLERMINA FUENTES (“Plaintiff”) will apply for an order
5 approving the California Labor Code Private Attorneys General Act (“PAGA”) settlement in
6 accordance with Labor Code §2699(l). The proposed settlement is set forth in the accompanying
7 Joint Stipulation of Settlement of PAGA Action and Release of PAGA Claims (the “Settlement
8 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 Brian J. St. John, Esq., the Declaration of the Plaintiff, 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 Defendant. The Labor
15 Workforce Development Agency has been served with this motion and the Settlement Agreement as
16 set forth in the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed,
17 the Parties respectfully request relief from the page limit requirement set by California Rules of Court,
18 Rule 3.1113(d).

19 DATED: October 27, 2025

JCL LAW FIRM, APC

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21 By: 

22 John L. Nitti, Esq.
23 Attorney for PLAINTIFF
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