

THE MARKHAM LAW FIRM

David R. Markham (SBN 71814)

dmarkham@markham-law.com

Lisa R. Brevard (SBN 323391)

lbrevard@markham-law.com

888 Prospect Street, Suite 200

La Jolla, CA 92037

Telephone: (619) 399-3995/Facsimile: (619) 615-2067

COHELAN KHOURY & SINGER

Isam C. Khoury (SBN 58759)

ikhoury@ckslaw.com

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Maggie K. Realin (SBN 263639)

mrealin@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001/Facsimile: (619) 595-3000

UNITED EMPLOYEES LAW GROUP

Walter L. Haines (SBN 71075)

whaines@uelglaw.com

8605 Santa Monica Blvd., #63354

West Hollywood, CA 90069

Telephone: (562) 256-1047/Facsimile: (562) 256-1006

Attorneys for Plaintiff Kevin Hickey

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

KEVIN HICKEY, an individual, on behalf of
himself and all others similarly situated,

Plaintiff,

vs.

TRANSFORM SEARS HOME SERVICES,
LLC, a Delaware corporation; and DOES 1
through 10, inclusive,

Defendants.

Case No. 34-2022-0321759

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Lauri A. Damrell

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (PAGA) SETTLEMENT**

Date: March 28, 2025

Time: 9:00 a.m.

Dept: 22

Reservation No: A-321759-001

Complaint filed: June 14, 2022

Trial date: None Set

PLEASE TAKE NOTICE, on March 28, 2025 at 9:00 a.m., or as soon as the matter may be heard in Department 22 of the above-captioned court, located at Gordon D. Schaber Courthouse, 720 9th Street, Sacramento, California, 95814, the Honorable Lauri A. Damrell presiding, Plaintiff Bethany A. Butler will move the Court for an Order Granting Approval of the Private Attorneys General Act (PAGA) Settlement. The Motion will be made on the grounds that the proposed Settlement is fair, adequate, reasonable, and in the best interest of Plaintiff, all Aggrieved Employees, and the Parties.

The Motion will be based on this Notice of Motion, the Memorandum of Points and Authorities, the Declaration of Plaintiff's Counsel Michael D. Singer, David R. Markham and Walter L. Haines, the Representative Action Settlement Agreement and Release, (Exhibit 1 to the Singer Declaration), Declaration of Plaintiff Kevin Hickey, Declaration of Denise Islas on Behalf of Simpluris, Inc., Defendant's Motion to Seal, and all other papers and records on file in this action, and on such oral and documentary evidence as may be presented at the hearing on this Motion.

Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative ruling may be downloaded off the court's website. If the party does not have online access, they may call the dedicated phone number for the department as referenced in the local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held.

Respectfully submitted,

COHELAN KHOURY & SINGER
THE MARKHAM LAW FIRM
UNITED EMPLOYEES LAW GROUP

Dated: March 4, 2025

By: 

Maggie K. Realin

Attorneys for Plaintiff KEVIN HICKEY, on behalf of himself and all others similarly situated