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Attorneys for Plaintiffs JESSE SANCHEZ and TIMOTHY BRAZZLE

**CALIFORNIA LABOR AND WORKFORCE
DEVELOPMENT AGENCY**

JESSE SANCHEZ and TIMOTHY BRAZZLE,

Plaintiffs,

vs.

J.A. MOSS, INC., a California corporation,
doing business as MOSS BROS. DODGE
RIVERSIDE, and DOES 1 through 50,

Defendants.

NOTICE OF SETTLEMENT

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PLEASE TAKE NOTICE that the parties in the above caption have reached a settlement of claims under California's Private Attorney General Act ("PAGA").

1. Plaintiffs Jesse Sanchez and Timothy Brazzle are two former J.A. Moss, Inc. ("Defendant") automotive technicians/mechanics who allege they were denied proper minimum wage and overtime compensation, as well as various other violations of California labor law.

2. Plaintiff Sanchez on or about November 4, 2015, filed with a PAGA Notice with the Labor and Workforce Development Agency ("LWDA") and served the Notice on Defendant.

1 3. On or about January 14, 2016, Plaintiff Sanchez filed a PAGA complaint against
2 Defendant J.A. Moss, Inc., in Riverside County Superior Court (RIC1600480).

3 4. Plaintiff Brazzle on or about January 28, 2016, filed with a PAGA Notice with the
4 LWDA and served the PAGA Notice on Defendant.

5 5. On or about April 15, 2016, Plaintiff Brazzle filed a PAGA complaint against
6 Defendant J.A. Moss, Inc., in Riverside County Superior Court (RIC1604443).

7 6. At a recent mediation, Plaintiffs and Defendants agreed to consolidate Plaintiffs'
8 individual, class, and PAGA claims into a single action in arbitration, and have reached a proposed
9 settlement.
10

11 7. The parties have submitted the matter to arbitration with JAMS Mediation, Arbitration,
12 and ADR Services ("JAMS") for resolution of the proposed settlement.

13 8. Under the terms of the proposed settlement agreement, fifty thousand dollars
14 (\$50,000.00) of the gross settlement amount has been set aside by the parties as PAGA penalties.
15

16 9. Per Labor Code§ 2699(i), seventy-five percent (75%) of the proposed allocated
17 penalties, or thirty-seven thousand five hundred dollars (\$37,500.00) will be payable to the LWDA.
18 The remaining twenty-five percent (25%), or twelve thousand five hundred dollars (\$12,500.00), will
19 be payable to settlement class members as the PAGA Amount.

20 10. Per Labor Code§ 2699(l), pending resolution of the matter in arbitration, the parties
21 shall submit the proposed settlement to the LWDA at the same time that it is submitted to the Court.
22

23 DATED: August 9, 2018

NUNES LAW GROUP, APC

24 *Tony Nunes*

25 By: ANTHONY J. NUNES
26 For Plaintiffs JESSE SANCHEZ and
27 TIMOTHY BRAZZLE
28

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