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Attorney for Plaintiff JOSEF BERNSTEIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

JOSEF BERNSTEIN, as an individual and on
behalf of other similarly situated employees,

Plaintiff,

vs.

PAYREEL, INC., a Colorado corporation,
ANHEUSER-BUSCH, LLC, a Missouri
corporation, 160OVER90, ENDEAVOR
OPERATING COMPANY, LLC, a Delaware
corporation, and DOES 1-50, inclusive,

Defendants

Case No. 25STCV08121

Assigned for all purposes to:
Judge Armen Tamzarian

**NOTICE OF MOTION AND MOTION
FOR ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE SECTION 2699 ET SEQ**

Hearing Date: May 13, 2025

Hearing Time: 9:00 a.m.

Department: 52

Reservation ID: 062892163758

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

2 PLEASE TAKE NOTICE that on May 13, 2025, at 9:00 a.m., in Department 52 of the
3 Superior Court of California for the County of Los Angeles, in the Stanley Mosk Courthouse,
4 located at 111 North Hill Street, Los Angeles, California 90012, Plaintiff will, and hereby does,
5 move for an order approving settlement of Plaintiff's penalty claims under the Private Attorney
6 Generals Act ("PAGA").

7 The basis for the motion is that the Plaintiff Josef Bernstein, have reached and fully
8 executed a settlement of the above-entitle case that disposes of the matter entirely. Pursuant to
9 statute, settlement of the PAGA claims requires court approval. (Cal Lab Code §2699(l)). Thus,
10 Plaintiff seeks the Court's approval of the PAGA claims.

11 This motion is based on this Notice, Plaintiff's Memorandum of Points and Authorities
12 filed concurrently herewith, and the Declaration of Armond Jackson, also filed concurrently
13 herewith, together with all the records on file in this action and oral argument that may be
14 presented at the time of hearing.

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18 Dated: April 4, 2025

JACKSON APC

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20 By: /s/ Armond M. Jackson
21 Armond M. Jackson
22 Attorney for Plaintiff Josef Bernstein
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