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Attorneys for Plaintiff,
ISRAEL NUNEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN MATEO

ISRAEL NUNEZ, an individual, and in a
representative capacity on behalf of the State of
California and other Aggrieved Employees,

Plaintiffs,

vs.

EPS, INC DBA EXPRESS PLUMBING &
SEWER SERVICES, a California Corporation,
and DOES 1-15

Defendants.

Case No. 25CIV02264

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF CALIFORNIA
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT OF 2004 ("PAGA")
SETTLEMENT**

*Filed concurrently with Memorandum of
Points and Authorities in Support of
Plaintiff's Motion for Approval of PAGA
Settlement; Declaration of Harris Emran, Esq
In Support of Plaintiff's Motion; [Proposed]
Order Approving PAGA Settlement;
[Proposed] Judgment Approving PAGA
Settlement*

Complaint Filed: March 28, 2025

Hearing Date: February 10, 2027
Time: 2:00 p.m.
Dept: 28
Hon. Nicole S. Healy

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on February 10, 2027, at 2:00 p.m. or as soon
thereafter as the matter may be heard, in **Department 28** of the above-entitled Court, Plaintiff Israel

1 Nunez, will respectfully request the Court's approval of the proposed and unopposed PAGA
2 Settlement Agreement of Plaintiff's representative claim for civil penalty claims under the Labor
3 Code Private Attorney General Act (i.e., Labor Code section 2698 et seq., "PAGA").

4 The basis for this application is that the parties have reached and fully executed a PAGA
5 Settlement Agreement of the above-entitled case that disposes of the matter entirely, and one aspect
6 of Plaintiffs' claims included a demand for relief under PAGA. Pursuant to Labor Code §2699(s)(2),
7 the settlement of PAGA claims requires court approval. Good cause exists for the Court to grant this
8 unopposed Motion as the proposed settlement is fair, adequate, and reasonable and in the best
9 interests of the Aggrieved Employees as a whole. Thus, the parties seek court approval of the PAGA
10 aspect of the settlement so that the matter may be dismissed entirely pursuant to the agreement of
11 the parties.

12 This application is based on this notice, the attached Memorandum of Points and Authorities,
13 the Declaration of Harris Emran, Esq., and all exhibits attached thereto, the PAGA Settlement
14 Agreement, as well as all records on file with this Court and such evidence or oral argument as may
15 be presented at the hearing.

16 As this motion is unopposed, the Parties respectfully request relief from the page limit
17 requirement set forth by California Rules of Court, Rule 3.1113(d).

18
19 Dated: June 1, 2026

EMRAN LAW FIRM P.C.

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21 By: Harris Emran
22 Harris Emran
23 Kaitlin Martinez
24 Attorneys for PLAINTIFF and OTHER
25 AGGRIEVED EMPLOYEES
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