

1 Michael A. Josephson
Kevin Collins
2 **JOSEPHSON DUNLAP LLP**
5847 San Felipe St, Suite 2400
3 Houston, Texas 77057
713-352-1100 – Telephone
4 713-352-3300 -- Facsimile
mjosephson@mybackwages.com
5 kcollins@mybackwages.com

6 Lance H. Kirk (SBN 281850)
LIONHEART LAW, PC
7 205 16th St. Unit B
Huntington Beach, California 92648
8 Tel: (714) 462-0997
lkirk@calplaw.onmicrosoft.com
9

10 *Counsel for Plaintiff*

11 **SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF SAN FRANCISCO**

13 DEBRA SCHIPANI, On Behalf of the State of
California and Aggrieved Employees,

14 Plaintiff,

15 v.

16 APFS, LLC d/b/a/ ADDISON
17 PROFESSIONAL
18 FINANCIAL SEARCH,

19 Defendant.

Case No: CGC-25-623366

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Action Filed: Mar. 17, 2025

20 Plaintiff Debra Schipani ("Plaintiff"), on behalf of herself, the State of California, and the
21 PAGA Employees, respectfully move this Court for an order approving the settlement of this
22 representative action under the Private Attorneys General Act of 2004, Labor Code section 2698,
23 *et seq.* ("PAGA"), pursuant to Labor Code section 2699(s)(2). In support of this Motion, Plaintiff
24 states as follows:
25

- 26 1. This is a representative enforcement action under PAGA to recover civil penalties on behalf
of Plaintiff, the State of California, and up to 50 current and former salaried recruiters who

1 worked for Defendant in California during the PAGA Period of January 9, 2024 through
2 the present. Defendant denies that any violation of the Labor Code occurred and denies
3 that civil penalties are warranted.

- 4 2. On July 9, 2025, the Parties reached a settlement for the resolution of Plaintiff's PAGA
5 claims following two full-day mediation sessions before an experienced wage-and-hour
6 mediator and subsequent arm's-length negotiations between counsel. The Parties
7 memorialized the terms of their agreement in the PAGA Settlement Agreement and
8 Release (the "Settlement Agreement"), and the Settlement Agreement is being
9 contemporaneously with the filing of this Motion to the Labor and Workforce
10 Development Agency ("LWDA") as required by Labor Code section 2699(s)(2).
11
12 3. The Parties' Settlement Agreement represents a fair, reasonable, and adequate resolution
13 of this action in relation to PAGA's purposes of remediating existing labor law violations,
14 deterring future violations, and maximizing enforcement of California's labor standards.
15 The Settlement resolves a bona fide dispute and was reached through arm's-length,
16 informed negotiations, as more fully set forth in the accompanying Memorandum of Points
17 and Authorities.
18

19 WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion, as more
20 fully briefed in the accompanying Memorandum of Points and Authorities and issue an order in
21 the form of the Proposed Order submitted herewith.
22
23
24
25
26

1 Dated: August 31, 2026

Respectfully Submitted,

2
3
4 /s/ Kevin Collins
Michael A. Josephson
Kevin Collins
5 **JOSEPHSON DUNLAP LLP**
5847 San Felipe St, Suite 2400
6 Houston, Texas 77057
7 713-352-1100 – Telephone
713-352-3300 – Facsimile
8 mjosephson@mybackwages.com
kcollins@mybackwages.com

9 Lance H. Kirk (SNB 281850)
10 **LIONHEART LAW, PC**
205 16th St. Unit B
Huntington Beach, California 92648
11 Tel: (714) 462-097
lkirk@calplaw.onmicrosoft.com

12
13 *Counsel for Plaintiff*

14
15 **CERTIFICATE OF CONFERENCE**

16 I hereby certify that I conferred with Counsel for Defendant, who has agreed to this Motion.

17 /s/ Kevin Collins
Kevin Collins

18
19 **CERTIFICATE OF SERVICE**

20 I hereby certify that a true and correct copy of the foregoing document was electronically
21 filed on August 31, 2026 with the Clerk of Court using the CM/ECF system, which will
22 automatically send email notification of such filing to all attorneys of record.

23 /s/ Kevin Collins
Kevin Collins