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Attorney for Plaintiff
DAMIAN DUNWOOD

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO

DAMIAN DUNWOOD, an individual;

Plaintiff,

vs.

BRINKS INCORPORATED, a Delaware
Corporation; SILAS STEELE, an individual; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 25CV002238

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO APPROVE PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT**

Reservation No. A-02238-010

Date: August 21, 2026
Time: 9:00 a.m.
Dept.: 8A
Judge: Hon. Jill H. Talley

Filed: January 28, 2025
Trial Date: None Set

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT ON August 21, 2026, at 9:00 a.m., or as soon thereafter
3 as the matter may be heard in Department 8A of the above-entitled Court, Plaintiff Damian
4 Dunwood ("Plaintiff") will move for entry of an Order for the following:

- 5 1. Finding that Plaintiff exhausted administrative remedies under the Private Attorneys
6 General Act ("PAGA") and, as such, was authorized to enter into this PAGA Settlement
7 Agreement ("Settlement") on behalf of the Labor and Workforce Development Agency.
8 If not otherwise set forth here, the capitalized defined terms shall have the same meaning
9 as set forth in the Settlement;
- 10 2. Approving the \$700,000 Gross PAGA Settlement Amount, which is incorporated by
11 reference as if stated here in full;
- 12 3. Approving the application for payment to PAGA Counsel of reasonable costs in the
13 amount of \$14,388.40;
- 14 4. Approving the appointment of Phoenix Settlement Administrators as the settlement
15 administrator and for payment to Phoenix Settlement Administrators for administering
16 said settlement in an amount not to exceed \$15,000;
- 17 5. Approving the application for payment to PAGA Counsel of reasonable attorneys' fees
18 in the amount of \$233,333.33 (1/3 of the Gross PAGA Settlement Amount);
- 19 6. Approving as to form and content the proposed Notice of PAGA Settlement, which
20 provides individuals within the scope of the settlement information regarding the
21 settlement;
- 22 7. Approving the proposed procedures to notify, and deliver payment to, the individuals
23 within the scope of the settlement by first class mail;
- 24 8. Directing Defendant Brink's, Incorporated ("Defendant") to report the Aggrieved
25 Employee Data to administer the settlement proceeds;
- 26 9. Directing that any residue from settlement checks that were not cashed by the check
27 cashing deadline be transmitted to the State of California Unclaimed Property Fund in
28

1 the name of the Aggrieved Employee; and

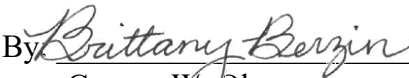
2 10. Approving and adopting the Proposed Order and its implementation schedule, which is
3 filed herewith and incorporated by reference.

4 This Motion is being made pursuant to California Labor Code section 2699(1)(2) on the
5 grounds that the proposed PAGA settlement is fair, reasonable, and adequate and furthers the
6 purpose behind the asserted California Labor Code statutes in deterring non-compliance. As a
7 result, the PAGA settlement should be approved by the Court. This Motion will be based on the
8 notice of motion, memorandum of points and authorities, the Declaration of Brittany V. Berzin, the
9 Declaration of Damian Dunwood, exhibits, the records and files of this case, and any further oral
10 or documentary evidence introduced at the hearing of this Motion.

11
12 **Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this**
13 **matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative**
14 **rulings for the department may be downloaded off the court's website. If the party does not**
15 **have online access, they may call the dedicated phone number for the department as**
16 **referenced in the local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on**
17 **the court day before the hearing and receive the tentative ruling. If you do not call the court**
18 **and the opposing party by 4:00 p.m. the court day before the hearing, no hearing will be**
19 **held.**

20 Dated: July 30, 2026

EMPLOYEE & CONSUMER ADVOCATES OF
NORTHERN CALIFORNIA PC

21 By 

22 Connor W. Olson
23 Brittany V. Berzin
24 Attorneys for Plaintiff
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