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Attorneys for Plaintiff
JAVIER MIRELES

SUPERIOR COURT OF CALIFORNIA

COUNTY OF TULARE

STATE OF CALIFORNIA ex rel. JAVIER
MIRELES as Private Attorney General,

Plaintiffs,

vs.

CENTRAL VALLEY CONSTRUCTION;
and DOES 1-25, inclusive,

Defendants.

CASE NO. VCU293499

**NOTICE OF UNOPPOSED MOTION
AND MOTION FOR AN ORDER
APPROVING SETTLEMENT OF
CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

*[Concurrently filed with the
Memorandum, Decl. of Lauren E.
Grochow, and Proposed Order]*

Complaint Filed: September 26, 2022
Trial Date: April 28, 2025

Hearing Date: March 24, 2025
Time: 08:30 AM
Dept.: 07

TO THE COURT, PARTIES, AND ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, pursuant to California Labor Code § 2699, on March 24, 2025, at 08:30 a.m. or as soon thereafter as the matter may be heard in Department 07 of the above-entitled Court, the Honorable Judge Gary Johnson, presiding, Plaintiff Javier Mireles ("Plaintiff"), on behalf himself and other aggrieved employees, will and hereby does move this Court for entry of an Order:

1. Approving the settlement entered into between Plaintiff Javier Mireles and Defendant Central Valley Construction ("Defendant") for representative claims under the Labor

Code Private Attorneys General Act of 2004 (“PAGA”), as reflected by the duly executed PAGA Settlement Agreement (“Settlement Agreement” or “SA”), **Exhibit A** to the Declaration of Lauren E. Grochow (“LG Dec.”).

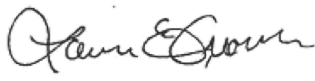
2. Approving distribution of a Gross Settlement Sum of \$100,000, as follows: 33% or \$33,000 in agreed attorneys’ fees; \$847.37 in litigation costs; \$3,750 to Phoenix Class Action Administration Solutions (“Settlement Administrator”); \$5,000 as enhancement payment to Plaintiff; and from remaining \$57,402.63, \$43,051.97 or 75% thereof to the State of California (LWDA) and \$14,350.66, balance or 25% to the PAGA class (average payout of \$39.75). (LG Dec. ¶¶ 14-15.)

Plaintiff also requests that the Court keep jurisdiction of the case while the order is fully complied with. Plaintiff will dismiss the case with prejudice once the terms and conditions of the Court Order are fully complied with.

This Motion is based upon this notice, the attached memorandum of points and authorities in support, the attached declaration of Lauren E. Grochow in support, and the records and files in this action.

Dated: February 18, 2025

GROCHOW LAW, A PROFESSIONAL CORP

By: 

Lauren E. Grochow
Daniel M. Kalinowski
Attorneys for Plaintiff Javier Mireles