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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**
12 **SPRING STREET COURTHOUSE**

13 JOEL LANUZA, as representative of the State
of California on behalf of himself and all other
14 aggrieved employees of Tower Wav LLC,

15 Plaintiff,

16 v.

17 TOWER WAV LLC, a California limited
liability company, and DOES 1 through 20,
18 inclusive,

19 Defendants.
20
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Case No. 25STCV26177

**NOTICE OF JOINT MOTION AND
JOINT MOTION FOR AN ORDER
APPROVING THE PAGA SETTLEMENT
AND ENTERING JUDGMENT
THEREON; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF JOINT MOTION** (filed
under separate cover); **DECLARATIONS
OF DANIEL V. SANTIAGO, JOEL
LANUZA, JEFFREY D. JOHNSON, AND
JUAN FERNANDO RIVERA IN
SUPPORT OF JOINT MOTION** (filed
under separate cover); and **[PROPOSED]
ORDER GRANTING JOINT MOTION**
(filed under separate cover).

Court Reservation Number: 564979995790

Hearing Date: February 17, 2026

Hearing Time: 8:30 a.m.

Hearing Location: Department 2

Complaint Filed: September 8, 2025

1 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 **PLEASE TAKE NOTICE** that the Plaintiff, Joel Lanuza, and the Defendant, Tower WAV
3 LLC, by and through their respective undersigned counsel, will appear on February 17, 2026, at
4 8:30 a.m. in Department 2 of the Superior Court of California, County of Los Angeles, located at
5 the Spring Street Courthouse, 312 North Spring Street, Los Angeles, California 90012, and jointly
6 move, and hereby jointly move, for entry of (1) an Order approving the PAGA settlement and (2)
7 Judgment thereon.

8 **PLEASE TAKE FURTHER NOTICE** that this Joint Motion is supported by, *inter alia*:
9 (1) the Memorandum of Points and Authorities filed concurrently herewith under separate cover; (2)
10 the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover; (3) the
11 Declaration of Joel Lanuza filed concurrently herewith under separate cover; (4) Declaration of
12 Jeffrey D. Johnson filed concurrently herewith under separate cover; (5) Declaration of Juan
13 Fernando Rivera filed concurrently herewith under separate cover; (6) the [Proposed] Order filed
14 concurrently herewith under separate cover; and (7) any additional information provided and/or
15 arguments made at the hearing on this Joint Motion.

16 Dated: December 23, 2025

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

17 By:

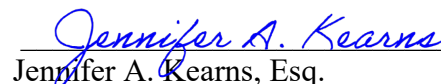


18 Daniel V. Santiago, Esq.
Attorney for Plaintiff, Joel Lanuza

19 Dated: December 23, 2025

DUANE MORRIS LLP

20 By:

21 
Jennifer A. Kearns, Esq.

22 Attorney for Defendant, Tower WAV LLC
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Reservation

Reservation ID:

564979995790

Reservation Type:

Motion for Order (JOINT MOTION FOR AN ORDER APPROVING THE PAGA SETTLEMENT AND ENTERING JUDGMENT THEREON)

Case Number:

25STCV26177

Case Title:

JOEL LANUZA vs TOWER WAV LLC

Filing Party:

Joel Lanuza (Plaintiff)

Location:

Spring Street Courthouse - Department 2

Date/Time:

February 17th 2026, 8:30AM

Status:

RESERVED

Number of Motions:

1

Motions

Motion for Order (JOINT MOTION FOR AN ORDER APPROVING THE PAGA SETTLEMENT AND ENTERING JUDGMENT THEREON)

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Reservation History

Status Date	Status	Action
12/23/2025 9:29AM	Reserved by User Date: February 17th 2026, 8:30AM Location: Spring Street Courthouse - Department 2 Motions: 1	View Receipt