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7 HERNANDEZ, individually, and on behalf
of all others similarly situated and aggrieved
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 JEANNE HERNANDEZ, individually, and on
behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 SKYONE FEDERAL CREDIT UNION; and
15 DOES 1 through 100, inclusive,

16 Defendants.
17
18

CASE NO.: 25STCV13757

**NOTICE OF MOTION AND MOTION
TO APPROVE PAGA SETTLEMENT**

[Assigned for all purposes to Hon. Judge
David S. Cunningham III, Dept. 11]

Department: 11

Date: September 8, 2026

Time: 10:00 a.m.

Complaint Filed: May 9, 2025

Trial Date: None set

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

2 PLEASE TAKE NOTICE that on September 8, 2026, at 10:00 a.m., or as soon thereafter
3 as the matter may be heard, in Department 11 of the Los Angeles County Superior Court, located
4 at Stanley Mosk Courthouse, 111 North Hill Street, Los Angeles, CA 90012, Plaintiff Jeanne
5 Hernandez ("Plaintiff") will and hereby does move this Court for an order approving the PAGA
6 Settlement Agreement (the "Settlement") between Plaintiff and Defendant SkyOne Federal
7 Credit Union ("Defendant") (Plaintiff and Defendant are collectively the "Parties"). The
8 Settlement is attached as Exhibit 1 to the Declaration of Taras Kick ("Kick Decl."), which is
9 submitted herewith under a separate cover.

10 The Settlement is on behalf of Plaintiff and all individuals who worked for Defendant as
11 non-exempt, hourly paid employees in California at any time during the PAGA Period (the
12 "Aggrieved Employees"). The "PAGA Period" means the period from April 29, 2024 to
13 December 7, 2025. Plaintiff alleges that Defendant is liable to her and other Aggrieved
14 Employees for Labor Code violations that were alleged in the Operative Complaint and PAGA
15 Notice, or that could have been alleged in the Operative Complaint and PAGA Notice based on
16 the facts alleged therein ("PAGA Released Claims").

17 Plaintiff seeks division of the \$220,000 Gross PAGA Settlement Amount as follows:
18 \$7,500 Service Award Payment to Plaintiff Jeanne Hernandez; \$77,000 PAGA Counsel Fees
19 Payment (35% of the Gross PAGA Settlement Amount); \$19,912.25 PAGA Counsel Litigation
20 Expenses Payment; \$3,009.72 Administration Expenses Payment; \$112,578.03 PAGA Payment
21 (35% to the Aggrieved Employees – \$39,402.31; 65% to the Labor and Workforce Development
22 Agency ("LWDA") – \$73,175.72).

23 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
24 Points and Authorities, the declarations of Taras Kick, Jeanne Hernandez, Lisa Gilbert, and
25 Michael Moore, the PAGA Settlement Agreement, all papers and pleadings on file with the
26 Court in this action, all matters judicially noticeable, and on such oral and documentary
27 evidence as may be presented in connection with the hearing on the motion.

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Respectfully Submitted,

DATED: August 12, 2026

THE KICK LAW FIRM, APC

/s/_____

Taras Kick, CA Bar No. 143379
Lauren Davis, CA Bar No. 294115

*Attorneys for Plaintiff Jeanne Hernandez,
individually, and on behalf of all others similarly
situated and aggrieved*

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I, the undersigned, certify and declare that I am over the age of 18 years, employed in
4 the County of Los Angeles, State of California, and not a party to the above-entitled cause. My
5 business address is The Kick Law Firm, APC, 815 Moraga Drive, Los Angeles, CA 90049.

6 On the executed date, I served the document(s) described as:

- 7 • **NOTICE OF MOTION AND MOTION TO APPROVE PAGA SETTLEMENT;**
8 • **PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT**
9 **OF MOTION TO APPROVE PAGA SETTLEMENT;**
10 • **DECLARATION OF TARAS KICK IN SUPPORT OF MOTION TO APPROVE**
11 **PAGA SETTLEMENT;**
12 • **DECLARATION OF JEANNE HERNANDEZ IN SUPPORT OF MOTION TO**
13 **APPROVE PAGA SETTLEMENT;**
14 • **DECLARATION OF LISA GILBERT;**
15 • **DECLARATION OF MICHAEL MOORE;**
16 • **[PROPOSED] ORDER AND JUDGMENT APPROVING PAGA SETTLEMENT,**

17 ☒ **By Electronic service (via electronic filing service provider):** I caused the
18 documents to be electronically transmitted to Case Anywhere, an electronic filing service
19 provider, at www.caseanywhere.com, pursuant to the Court's Electronic Case Management
20 Order governing the matter and mandating electronic service to person(s) at the address(es) listed
21 above. The transmission was reported as complete and without error to the addressees as stated
22 below.

23 **O'HAGAN MEYER**

24 ANTHONY C. OCEGUERA, SB# 259117

25 E-Mail: AOceguera@ohaganmeyer.com

26 ELAINE McCORMICK, SB# 340044

27 E-Mail: EMccormick@ohaganmeyer.com

28 1201 K Street, Suite 1960

Sacramento, California 95814

Ph: 916.884.0752

Attorneys for Defendant SkyOne Federal Credit Union

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct. Executed on August 12, 2026.

/s/ Alina Muresan

Alina Muresan