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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10 LUIS GONZALEZ, individually and on behalf
of all aggrieved employees of Defendants in the
11 State of California,

12 Plaintiff,

13 v.

14 ROLLING HILLS COMMUNITY
ASSOCIATION OF RANCHO PALOS
15 VERDES, and DOES 1 through 50 inclusive,

16 Defendants.

Case No.: 23TRCV00477

*[Assigned for all purposes to the Hon. Tamara
Hall, Department 1]*

REPRESENTATIVE ACTION

**NOTICE OF PLAINTIFF LUIS GONZALEZ'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Date: June 16, 2025

Time: 8:30 a.m.

Dept: 1

Judge: Hon. Tamara Hall

Complaint Filed: February 17, 2023

Trial Date: None set

Reservation ID: 391833313645

*[Memorandum of Points and Authorities;
Declarations of Hali M. Anderson, Luis Gonzalez
and Sean Hartranft on behalf of Apex Class Action,
LLC; and [Proposed] Order are filed concurrently
herewith.]*

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 16, 2025 at 8:30 a.m., in Department 1 of the Los Angeles County Superior Court, located at One Regent Street, Inglewood, CA 90301, Plaintiff Luis Gonzalez (“Plaintiff”), will and hereby does, move for an Order: (1) granting approval of the proposed settlement claims brought under the California Labor Code’s Private Attorneys General Act of 2004 (Labor Code section 2698 et seq.) (“PAGA”) set forth in the parties’ PAGA Settlement Agreement (“Settlement” or “Agreement”), which is attached as Exhibit 1 to the Declaration of Hali M. Anderson; (2) directing payment of attorneys’ fees in the amount of \$31,666.67 and litigation costs in the amount of \$12,000 from the Gross Settlement Amount to GrahamHollis APC; (3) appointing Apex Class Action, LLC as the Administrator and approving payment of its fees not to exceed \$2,586.94 from the Gross Settlement Amount; (4) directing disbursement of the PAGA Penalties payment (\$43,746.39), with 25% (\$10,936.60) distributed to the Aggrieved Employees and 75% (\$32,809.79) paid to the LWDA; and (6) entering Judgment in accordance with the terms of the Settlement Agreement and Approval Order.

Plaintiff’s Motion is made pursuant to California Labor Code section 2699(1)(2) on the grounds that the Settlement was reached as a result of informed arm’s-length negotiations, is fair, reasonable and adequate, and is deserving of approval for the benefit of the State of California, the general public and the aggrieved employees. A copy of the parties’ Agreement is being submitted to the California Labor and Workforce Development Agency concurrently with the filing of Plaintiff’s Motion in accordance with California Labor Code section 2699(1)(2).

Plaintiff’s Motion is based upon this Notice; the accompanying Memorandum of Points and Authorities; the Settlement Agreement; the declarations of Hali M. Anderson, Plaintiff Luis Gonzalez, Sean Hartranft on behalf of Apex Class Action, LLC; the [Proposed] Order and Judgment; all pleadings and papers filed in the above-entitled action; and upon any other such evidence and oral argument that may be presented to the Court at the time of the hearing.

Dated: May 9, 2025

GRAHAMHOLLIS APC

Bv: _____


Hali M. Anderson

Samara A. Bahu

Attorneys for Plaintiff Luis Gonzalez



Court Reservation Receipt

Reservation

Reservation ID: 391833313645	Status: RESERVED
Reservation Type: Motion re: (Approval of PAGA Settlement)	Number of Motions: 1
Case Number: 23TRCV00477	Case Title: LUIS GONZALEZ vs ROLLING HILLS COMMUNITY ASSOCIATION OF RANCHOS PALOS VERDES, et al.
Filing Party: Luis Gonzalez (Plaintiff)	Location: Inglewood Courthouse - Department 1
Date/Time: June 16th 2025, 8:30AM	Confirmation Code: CR-ADV9M6DC9HGFCU8DZ

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00
TOTAL			\$0.00

Payment

Amount: \$0.00	Type: NOFEE
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