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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF STANISLAUS**

9 **NICOLE PRIOLA, an individual,**
10 **Plaintiff,**

11 **vs.**

12 **COPPER AND GOLD, LLC, a limited**
13 **liability corporation, PENNY**
14 **NEWMAN GRAIN CO., a corporation;**
15 **and DOES 1-10, inclusive,**

16 **Defendants.**

CASE NO: CV-22-005730

NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT AND
DISMISS ACTION WITH PREJUDICE

Date: April 5, 2024

Time: 8:30 am

Dept.: 24

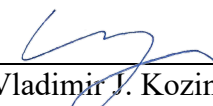
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18 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

19 PLEASE TAKE NOTICE that on April 5, 2024 at 8:30 am in Department 24 of the above-
20 captioned Court, located at 801 10th Street, Fourth Floor, Modesto, California 95354, or as soon
21 thereafter as this matter may be heard, Plaintiff Nicole Priola ("Plaintiff") will and hereby does
22 move pursuant to Labor Code section 2699(1)(2) for approval of the settlement reached between
23 Plaintiff and Defendants Copper and Gold, Inc. and Penny Newman Grain Co. ("Defendants"), of
24 Plaintiff's claims under the Labor Code Private Attorneys General Act of 2004 ("PAGA"), set forth
25 as the Eighth Cause of Action to Plaintiff's First Amended Complaint filed with this Court.
26 Plaintiff further moves for an order dismissing the Action with prejudice. Defendants do not oppose
27 the instant Motion.
28

1 This motion shall be based on this Notice of Motion, Plaintiff's Memorandum of Points and
2 Authorities in Support, the Declaration of Vladimir J. Kozina, the Proposed Order Approving
3 PAGA Settlement and Dismissing Action with Prejudice, all filed concurrently herewith, and upon
4 such other and further evidence and argument as may be presented at the hearing on this motion.

5 DATED: February 21, 2024

MAYALL HURLEY, P.C.

7
8 By: 

Vladimir J. Kozina
Attorneys for Plaintiff
NICOLE PRIOLA