

Daniel V. Santiago (SBN 206532)
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
VAN NUYS COURTHOUSE EAST**

ANAEE J. ZUNIGA, individually and as
representative of the State of California on
behalf of all aggrieved employees,

Plaintiff,

v.

DR. PATRICIA L. WALTERS, an individual
d/b/a TARZANA WOUND CARE CENTER,
and DOES 1 through 20, inclusive,

Defendants.

Case No. 22VECV01944

**NOTICE OF PLAINTIFF'S EX PARTE
APPLICATION AND PLAINTIFF'S EX
PARTE APPLICATION FOR AN ORDER
(1) APPROVING THE SETTLEMENT OF
PLAINTIFF'S INDIVIDUAL PAGA
CLAIMS AGAINST THE DEFENDANT
AND DISMISSING THOSE PAGA
CLAIMS WITH PREJUDICE AND (2)
DISMISSING PLAINTIFF'S PAGA
CLAIMS ON BEHALF OF THE OTHER
ALLEGEDLY AGGRIEVED
EMPLOYEES WITHOUT PREJUDICE;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover);
DECLARATION OF DANIEL V.
SANTIAGO IN SUPPORT OF
PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover);
and [PROPOSED] ORDER GRANTING
PLAINTIFF'S EX PARTE
APPLICATION (filed under separate cover).**

Date of Ex Parte Hearing: September 18, 2023
Time of Ex Parte Hearing: 8:30 a.m.
Location of Ex Parte Hearing: Dept. W of Los
Angeles Superior Court, Van Nuys
Courthouse East
Complaint Filed: November 9, 2022

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

2 **PLEASE TAKE NOTICE** that the Plaintiff, Anaee J. Zuniga, by and through her
3 undersigned counsel, will appear on Monday, September 18, 2023, at 8:30 a.m. before the
4 Honorable Judge Presiding in Department W of the Superior Court of California, County of Los
5 Angeles, Van Nuys Courthouse East, located at 6230 Sylmar Ave., Van Nuys, California 91401, on
6 her Ex Parte Application for an Order: approving the settlement of her individual PAGA claims
7 against the Defendant, Dr. Patricia L. Walters; dismissing *with* prejudice Plaintiff's individual
8 PAGA claims against the Defendant; dismissing *with* prejudice Plaintiff's non-PAGA claims
9 against the Defendant; and dismissing *without* prejudice Plaintiff's PAGA claims against the
10 Defendant on behalf of other aggrieved employees.

11 **PLEASE TAKE FURTHER NOTICE** that this Ex Parte Application is supported by, *inter*
12 *alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under separate
13 cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover;
14 (3) the [Proposed] Order filed concurrently herewith under separate cover; and (4) any additional
15 information provided and/or arguments made at the hearing on this Ex Parte Application.

16 Dated: September 11, 2023

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

17 By: 

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