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10 Attorneys for Plaintiff SAVITA JAYRAM individually and on behalf of all others similarly
11 situated.

12 *Additional Counsel Listed on Following Page*

13 **SUPERIOR COURT OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

15 SAVITA JAYRAM, on behalf of the State of
16 California, as a private attorney general,

17 Plaintiff,

18 vs.

19 THE BUNDOX RESTAURANT CORP., a
20 California Corporation; and DOES 1 through
21 50, inclusive,

22 Defendants.

Case No.: CASE NO. CGC-23-610167
(consolidated with Case No. CGC-23610212)

Assigned to: Hon. Jeffrey S. Ross, Dept. 606

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF AMENDED PAGA
SETTLEMENT AGREEMENT**

Date: September 25, 2025
Time: 11:00 a.m.
Dept: 606

Complaint Filed: November 3, 2023
Trial Date: None Set

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1 **PLEASE TAKE NOTICE** that on September 25, 2025 at 11:00 a.m. or as soon thereafter
2 as the matter may be heard before the Honorable Jeffrey S. Ross in Department 606 of the
3 Superior Court of the State of California, for the County of San Francisco, located at 400
4 McAllister Street, San Francisco, California 94102, Plaintiff Savita Jayram (“Plaintiff”) will, and
5 hereby does, move this Court for entry of an order as follows:

6 1. Granting approval, pursuant to California Labor Code section 2699(s)(2), of
7 the settlement between Plaintiff and Defendant the Bundox Restaurant Corp. (“Defendant”), of the
8 claims brought by Plaintiff pursuant to the Private Attorneys General Act of 2004 (“PAGA”), as
9 set forth in the Private Attorneys General Act – Amended Settlement Agreement (“Amended
10 PAGA Settlement Agreement”), attached as Exhibit A to the Declaration of Lenden F. Webb,
11 including but not limited to, the allocation and distribution of the Gross Settlement Amount for
12 payment to the California Labor and Workforce Development Agency (“LWDA”), Individual
13 PAGA Payments to the Aggrieved Employees, Attorneys’ Fees and Litigation Expenses to
14 PAGA Counsel, and Settlement Administration Costs to the PAGA Settlement
15 Administrator;

16 2. Approving the total Gross Settlement Amount of \$5,000.00 and the Net Settlement
17 Amount of \$3,000.00 which will be distributed as PAGA Penalties to the LWDA and the
18 Aggrieved Employees, of which seventy-five percent (75%) will be paid to the LWDA
19 (“LWDA PAGA Payment”) and twenty-five percent (25%) will be paid to the Aggrieved
20 Employees as Individual PAGA Payments;

21 3. Appointing Apex Class Action, LLC (“Apex”) as the PAGA Settlement
22 Administrator (“Administrator”);

23 4. Directing Defendant to transmit the total Gross Settlement Amount of
24 \$5,000.00 into a qualified settlement account established by the Administrator for administration
25 of the Settlement, and directing the Administrator to distribute the Gross settlement
26 Amount in accordance with the Settlement Agreement;

27 5. Directing the mailing of Individual PAGA Payment checks to the
28 Aggrieved Employees within the time period set forth in the Settlement Agreement;

1 6. Awarding up to \$1,500.00 to the Administrator as Settlement Administration
2 Costs;

3 7. Awarding not more than \$500 to Plaintiff's Counsel, as compensation for reasonable
4 attorneys' fees and litigation expenses ("Attorneys' Fees and Expenses"), pursuant to
5 California Labor Code section 2699(g)(1).

6 The Amended Settlement Agreement and all papers in support of this motion have been
7 submitted to the LWDA in compliance with California Labor Code section 2699(s)(2).

8 This motion will be, and hereby is, made pursuant to California Labor Code section
9 2699(s)(2), which provides for review and approval by the Court of the settlement of a civil action
10 filed pursuant to PAGA. This Motion will be, and hereby is, made on the grounds that the
11 Amended PAGA Settlement Agreement entered into by the Parties is fair and reasonable given the
12 facts relevant to Plaintiff's PAGA claims.

13 This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and
14 Authorities and the Declaration of Lenden F. Webb in support of Plaintiff's Motion for Approval
15 of PAGA Settlement filed on June 27, 2025, the Declaration of Paul V. Simpson in support of
16 Plaintiff's Motion for Approval of PAGA Settlement filed on July 31, 2025, Declaration of Lenden
17 W. Webb in support of Motion for Approval of Amended Settlement Agreement filed herewith, all
18 papers on file in this Action, and on such oral argument as the Court may permit at the hearing on
19 this Motion.

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21 DATED: August 15, 2025

WEBB LAW GROUP APC

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23
24 By: 

Lenden Webb
Attorneys for Plaintiff, the State of California,
and Aggrieved Employees