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Attorneys for Plaintiff SHAWNTE JOHNSON, in a Representative capacity only, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

SHAWNTE JOHNSON, in a Representative
capacity only, and on behalf of other members of
the general public similarly situated,

Plaintiff,

v.

HERCULES FORWARDING, INC., a
California corporation; and DOES 1 - 10,
inclusive,

Defendants.

Case No. 23STCV05374

Assigned to the Hon. Julian C. Recana

**AMENDED NOTICE OF MOTION FOR
COURT APPROVAL OF THE PARTIES'
PAGA SETTLEMENT**

Date: August 28, 2025
Time: 9:00 a.m.
Dept.: Department L

Complaint Filed: March 10, 2023
Trial Date: None Set

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

2 **PLEASE TAKE AMENDED NOTICE** that on August 28, 2025 at 9:00 a.m., or as soon
3 thereafter as counsel may be heard, in Department L of the above-captioned court, located at 12720
4 Norwalk, Los Angeles, California 90650, the Honorable Hon. Julian C. Recana presiding, Plaintiff will,
5 and hereby does, move this Court for entry of an order and judgment approving the Parties' PAGA
6 settlement pursuant to Labor Code section 2699(s)(2).

7 This Motion is based upon this Amended Notice and the previously filed documents as reflected
8 in the ROA (dated 5/15/25) including the Memorandum of Points and Authorities in Support of Motion
9 for Court approval of the PAGA Settlement; the Declaration of Eric K. Yaeckel, which attaches the PAGA
10 Settlement Agreement; the Declaration of Raul Perez; the [Proposed] Order and Judgment Approving the
11 PAGA Settlement Agreement; all the records, pleadings, and papers filed in this action and upon such
12 other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing
13 of this Motion.

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15 Dated: July 31, 2025

SULLIVAN & YAECKEL LAW GROUP APC

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17 By: 

Eric K. Yaeckel
Ryan T. Kuhn

18 Attorneys for Plaintiff SHAWNTE JOHNSON, in a
19 Representative capacity only, and on behalf of other
20 members of the general public similarly situated
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