

1 GRAHAMHOLLIS APC
Vilmarie Cordero (SBN 268860)
2 vcordero@grahamhollis.com
Allison E. Schubert (SBN 339991)
3 aschubert@grahamhollis.com
3555 Fifth Avenue Suite 200
4 San Diego, California, 92103
5 Telephone: 619.692.0800
Facsimile: 619.692.0822
6

7 Attorneys for Plaintiff Javier Muzquiz

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10 JAVIER MUZQUIZ, as an individual on behalf
of himself and all other similarly situated
11 employees and/or aggrieved employees of
Briles,

12
13 Plaintiff,

14 v.

15 Briles Aerospace, LLC, a California limited
liability company, and DOES 1 THROUGH 50,
16 inclusive,

17 Defendant.
18
19
20
21
22
23
24
25
26
27
28

Case No.: 23STCV15241

[Assigned for All Purposes to Hon. Stuart M. Rice,
Dept. 1]

PAGA REPRESENTATIVE ACTION

**NOTICE OF UNOPPOSED MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
REQUEST FOR AWARD OF ATTORNEYS'
FEES, COSTS, ENHANCEMENT AWARD,
AND SETTLEMENT ADMINISTRATION
EXPENSES**

Date: June 5, 2025
Time: 10:30 a.m.
Dept: 1
Judge: Hon. Stuart M. Rice

*[Memorandum of Points and Authorities; the
Declarations of Vilmarie Cordero and Javier
Muzquiz; and [Proposed] Order are filed
concurrently herewith]*

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 5, 2025 at 10:30 a.m., in Department 1 of the Los Angeles County Superior Court, located at 312 North Spring Street, Los Angeles, CA 90012, Plaintiff Javier Muzquiz (“Plaintiff”), will and hereby does, move unopposed for an Order: (1) granting the approval of the proposed settlement of claims brought under the California Labor Code’s Private Attorneys General Act of 2004 (Labor Code § 2698 *et seq.*) (“PAGA”) set forth in the parties’ PAGA Settlement Agreement and Release of PAGA Claims (“Settlement” or “Settlement Agreement”), which is attached as Exhibit 1 to the Declaration of Vilmarie Cordero; (2) directing payment of attorneys’ fees in the amount of \$84,000 and litigation costs in the amount of \$15,577.96 from the Gross Settlement Amount to Plaintiff’s counsel; (2) directing payment of an Enhancement Award to Plaintiff in the amount of \$5,000 from the Gross Settlement Amount; (3) appointing Apex Class Action, LLC as the Settlement Administrator and approving payment of its fees not to exceed \$3,990 from the Gross Settlement Amount; (4) directing disbursement of the Net Settlement Amount (the amount remaining of the Gross Settlement Amount following these deductions) pursuant to the terms of the Settlement Agreement; and (5) dismissing this action with prejudice.

Plaintiff’s Motion is made pursuant to California Labor Code section 2699(l)(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. In accordance with Labor Code section 2699(l)(2), a copy of the parties’ Settlement Agreement has been submitted to the California Labor and Workforce Development Agency concurrently with the filing of Plaintiff’s Motion.

This Motion is based upon this Notice; the accompanying Memorandum of Points and Authorities; the Settlement Agreement; the declaration of Vilmarie Cordero and any exhibits thereto, the declaration of Javier Muzquiz; 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.

///

///

///

1 Dated: May 13, 2025

GRAHAMHOLLIS APC

2
3 By: 
4 Vilmarie Cordero
5 Allison E. Schubert
6 *Attorneys for Plaintiff Javier Muzquiz*
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28