

1 Daniel V. Santiago (SBN 206532)
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Attorney for the Plaintiff, Quan M. Doan

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE**

10 QUAN M. DOAN, individually and as
representative of the State of California on
11 behalf of himself as an aggrieved employee of
Secure Guard Security Services, Inc.,

12 Plaintiff,

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14 v.

15 SECURE GUARD SECURITY SERVICES,
INC., a California corporation, and DOES 1 -
16 20, inclusive,

17 Defendants.

Case No. 30-2025-01495141-CU-OE-CJC

**NOTICE OF MOTION AND
PLAINTIFF'S MOTION FOR AN
ORDER: (1) APPROVING THE
SETTLEMENT OF PLAINTIFF'S PAGA
CLAIMS; (2) DISMISSING ALL CLAIMS
WITH PREJUDICE; AND (3) VACATING
ALL DATES ON THE COURT'S
CALENDAR; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF PLAINTIFF'S MOTION**
(filed under separate cover);
**DECLARATION OF DANIEL V.
SANTIAGO IN SUPPORT OF
PLAINTIFF'S MOTION** (filed under
separate cover); and **[PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION**
(filed under separate cover).

Court Reservation Number: 74652729

Hearing Date: February 5, 2026

Hearing Time: 1:30 p.m.

Hearing Location: Department C18

Complaint Filed: July 7, 2025

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

26 **PLEASE TAKE NOTICE** that the Plaintiff, Quan M. Doan, by and through his
27 undersigned counsel, will appear on February 5, 2026, at 1:30 p.m. in Department C18 of the
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1 Superior Court of California, County of Orange, Central Justice Center, located at 700 W. Civic
2 Center Dr., Santa Ana, California 92701, and move, pursuant to the parties' agreement to settle this
3 action in its entirety, for an Order: (1) approving the settlement of Plaintiff's PAGA claims; (2)
4 dismissing all claims with prejudice; and (3) vacating all dates on the Court's calendar.

5 **PLEASE TAKE FURTHER NOTICE** that this motion is supported by, *inter alia*: (a) the
6 Memorandum of Points and Authorities filed concurrently herewith under separate cover; (b) the
7 Declaration of Daniel V. Santiago filed concurrently herewith under separate cover; (c) the
8 [Proposed] Order filed concurrently herewith under separate cover; and (d) any additional
9 information provided and/or arguments made at the hearing on this motion.

10 Dated: September 6, 2025

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

11 By:



12 Daniel V. Santiago

13 Attorney for Plaintiff, Quan M. Doan
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