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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE**
10 **CIVIL COMPLEX CENTER**

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

13 Plaintiff,

14 v.

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

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

**NOTICE OF RENEWED MOTION AND
PLAINTIFF'S RENEWED 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 RENEWED
MOTION (filed under separate cover);
DECLARATION OF DANIEL V.
SANTIAGO IN SUPPORT OF
PLAINTIFF'S RENEWED MOTION (filed
under separate cover); and [PROPOSED]
ORDER GRANTING PLAINTIFF'S
RENEWED MOTION (filed under separate
cover).**

Court Reservation Number: 74699901

Hearing Date: April 16, 2026

Hearing Time: 1:30 p.m.

Hearing Location: Department CX103

Complaint Filed: July 7, 2025

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

2 **PLEASE TAKE NOTICE** that the Plaintiff, Quan M. Doan, by and through his
3 undersigned counsel, will appear on April 16, 2026, at 1:30 p.m. in Department CX103 of the
4 Superior Court of California, County of Orange, Civil Complex Center, located at 751 W. Santa
5 Ana Blvd., Santa Ana, California 92701, and move, pursuant to the parties' agreement to settle this
6 action in its entirety, for an Order: (1) approving the settlement of Plaintiff's PAGA claims; (2)
7 dismissing all claims with prejudice; and (3) vacating all dates on the Court's calendar. *Notably,*
8 *Plaintiff's PAGA claims in this action are on behalf of one and only one allegedly aggrieved*
9 *employee of Defendant (Plaintiff himself), as he has not alleged any PAGA claim on behalf of any*
10 *allegedly aggrieved employee of Defendant other than himself. Therefore, the only PAGA claims in*
11 *this action are Plaintiff's individual PAGA claims.*

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

17 Dated: November 6, 2025

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

18 By:



19 Daniel V. Santiago

20 Attorney for Plaintiff, Quan M. Doan
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