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8 Attorneys for Plaintiff, Robert Villescascas,
on behalf of himself and all others similarly situated
9

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN BERNARDINO**
13

14 Coordination Proceeding Special Title
(Cal. Rules of Ct., Rule 3.550)

15 **PETCO WAGE AND HOUR CASES**

16 Included actions:

17 *Villescascas v. Petco Animal Supplies Stores, Inc.,*
18 *et al.*

19 *Lewis v. Petco Animal Supplies Stores, Inc., et*
20 *al.*

21 *Harrison v. Petco Animal Supplies Stores, Inc.,*
et al.
22
23
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25
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Case No.: JCCP5347
(Lead Case No. CIVSB2306447)

Assigned for All Purposes to:
Hon. Jeffrey R. Ericson
Dept.: V12

**PLAINTIFFS' UNOPPOSED NOTICE OF
MOTION AND MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: December 10, 2026
Time: 8:35 a.m.
Dept.: V12

Complaint Filed (Lead): March 14, 2023
Trial Date: Not Set

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT on December 10, 2026, at 8:35 a.m., or as soon thereafter
3 as the matter may be heard in Department V12 of the above-entitled Court, located at 14455 Civic
4 Drive, Victorville, CA 92392, before the Honorable Jeffrey R. Ericson, Plaintiffs Robert Villescas,
5 Michael Lewis, and Alanna Harrison will and hereby do move, unopposed, for entry of an order
6 approving the Parties' settlement of claims for civil penalties under the California Labor Code
7 Private Attorneys General Act of 2004 ("PAGA").

8 This Motion seeks approval of: (1) the Parties' Joint Stipulation of PAGA Settlement and all
9 terms contained therein; (2) the Gross Settlement Amount of Two Million, Two Hundred Twenty
10 Thousand Dollars (\$2,220,000.00); (3) appointment of ILYM Group, Inc., as the Administrator and
11 payment of settlement administration costs in an amount not to exceed Thirty Thousand Dollars
12 (\$30,000.00), to be paid from the Gross Settlement Amount; (4) distribution of the Net PAGA
13 Settlement Amount in accordance with Labor Code section 2699, including seventy-five percent
14 (75%) to the Labor and Workforce Development Agency and twenty-five percent (25%) to
15 Aggrieved Employees; (5) payment of attorneys' fees in an amount not to exceed thirty five percent
16 (35%) of the Gross Settlement Amount (i.e., \$777,000), and reasonable litigation costs not to exceed
17 Forty Eight Thousand Dollars (\$48,000.00), as set forth in the Settlement Agreement; and (6)
18 dismissal of Plaintiffs' representative PAGA claims with prejudice.

19 This Motion is based upon this Notice, the Memorandum of Points and Authorities, the
20 Declarations of Lance Dacre (including the PAGA Settlement Agreement attached thereto), Kyle
21 Nordrehaug, and Dawn M. Berry, the pleadings and records on file in this action, and upon such
22 further oral and documentary evidence as may be presented at the hearing of this Motion. Pursuant
23 to Labor Code section 2699(1)(2), the Labor and Workforce Development Agency has been provided
24 notice of this Motion and the Settlement Agreement.

25 Dated: August 26, 2026

JAMES HAWKINS APLC

26 By 
27 Isandra Fernandez
28 Lance Dacre
Attorneys for Plaintiff Villescas

PROOF OF SERVICE, COUNTY OF ORANGE

I am a resident of the State of California, County of Orange. I am over the age of eighteen years and not a party to the within action. My business address is 9880 Research Drive., Suite 200, Irvine, California 92618.

On August 26, 2026, I served on the interested parties in this action the following document(s) entitled:

-PLAINTIFF'S UNOPPOSED NOTICE OF MOTION AND MOTION FOR APPROVAL OF PAGA SETTLEMENT

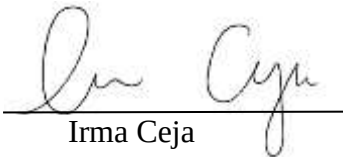
[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address irma@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

SERVICE LIST

PLEASE SEE PAGE ATTACHED

[X] STATE: I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on August 26, 2026, at Irvine, California.


Irma Ceja

SERVICE LIST

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<http://www.dir.ca.gov/Private-Attorneys-General-Act>
(via website only)