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6 Attorneys for Plaintiff CHARLES KEOPIMPHA

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8 **SUPERIOR COURT OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF LOS ANGELES**

10 CHARLES KEOPIMPHA, on behalf of the
11 State of California, and others similarly
situated and aggrieved,

12 Plaintiff,

13 v.
14

15 MANPOWER US INC., a Delaware
Corporation; MANPOWERGROUP US
16 INC., a Wisconsin Corporation;
17 HONEYWELL INTERNATIONAL, INC.,
a Delaware Corporation; and DOES 1-100,
18 inclusive,

19 Defendants.
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Case No.: 22STCV26888 (Lead Case)
23STCV18670 (Related Case)

Assigned for All Purposes to:
Hon. Michael Schultz
Dept. 40

NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT

Date: August 21, 2025
Time: 8:30 a.m.
Dept.: 40

Reservation ID: 166053299611

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on August 21, 2025, at 8:30 a.m., or as soon thereafter as
3 the matter may be heard, in Department 40 of the above-captioned Court, located at 111 N. Hill
4 St., Los Angeles, California, Plaintiff Charles Keopimpha, on behalf of himself and the State of
5 California by and through the Labor Workforce & Development Agency, will and hereby does
6 move the Court for an order granting approval of the proposed settlement under the Private
7 Attorneys General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil
8 penalties to the State and the Aggrieved Employees, approving Phoenix Settlement
9 Administrators as the Settlement Administrator and payment of its fees in the amount of
10 \$2,500.00, approving Plaintiff's enhancement award in the amount of \$10,000, and approving
11 payment of Plaintiff's counsel's attorney's fees in the amount of \$26,666.66 and costs in the
12 amount of \$8,073.62.

13 This motion is brought under Labor Code section 2699(l)(2), and on the grounds that the
14 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
15 and the requested service award and attorney's fees and costs are fair and reasonable under the
16 circumstances of the case.

17 This motion is based upon this Notice of Motion and Motion, the accompanying
18 memorandum of points and authorities, the accompanying declarations of Brandon Brouillette,
19 Jodey Lawrence, and Charles Keopimpha, the Parties' PAGA Settlement Agreement filed
20 herewith, the entire Court file in this matter, and on such other argument and evidence as may be
21 presented at or before the hearing in this matter.

22
23 Dated: June 17, 2025

CROSNER LEGAL, PC

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26 _____
27 Brandon Brouillette
28 Zachary M. Crosner
Attorneys for Plaintiff CHARLES KEOPIMPHA



Make a Reservation

FERNANDO ALENCASER, vs HONEYWELL INTERNATIONAL, INC.

Case Number: 22STCV26888 Case Type: Civil Unlimited Category: Other Employment Complaint Case
Date Filed: 2022-08-18 Location: Spring Street Courthouse - Department 7

Reservation

Case Name:

FERNANDO ALENCASER, vs HONEYWELL
INTERNATIONAL, INC.

Case Number:

22STCV26888

Type:

Motion for Order (MOTION FOR APPROVAL OF
SETTLEMENT UNDER PRIVATE ATTORNEYS GENERAL
ACT)

Status:

RESERVED

Filing Party:

Charles Keopimpha (Plaintiff)

Location:

Stanley Mosk Courthouse - Department 40

Date/Time:

08/21/2025 8:45 AM

Number of Motions:

1

Reservation ID:

166053299611

Confirmation Code:

CR-4EPWLZ27IZSSTAY25

Fees

Description	Fee	Qty	Amount
Motion for Order (name extension)	0.00	1	0.00
TOTAL			\$0.00

Payment

Amount:

\$0.00

Type:

NOFEE

Account Number:

n/a

Authorization:

n/a

Payment Date:

n/a

Print Receipt

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