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Attorneys for Plaintiff,
Baktash Tareen

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN JOAQUIN

BAKTASH TAREEN, on behalf of himself and
in his representative capacity on behalf of the
State of California, and all other aggrieved
employees,

Plaintiff,

v.

DORNOCH INC., a California corporation,
THOMAS NOKES, an individual, BRIAN
NOKES, and DOES 1-25

Defendants.

Case No: STK-CV-UOE-2023-0008133

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF CALIFORNIA
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT OF 2004 ("PAGA")
SETTLEMENT**

*Filed concurrently with Memorandum of
Points and Authorities in Support of
Plaintiff's Motion for Approval of PAGA
Settlement; Declaration of Harris Emran,
Esq; [Proposed] Order Granting Approval of
PAGA Settlement; [Proposed] Judgment
thereon]*

[Complaint Filed: July 31, 2023]

Date: October 1, 2025
Time: 9:00 a.m.
Dept: 11A
Hon. Esmeralda Zendejas

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on **OCTOBER 1, 2025**, at **9:00 a.m.**, or as soon
thereafter as the matter may be heard, in **Department 11A** of the above-entitled Court, Plaintiff
BAKTASH TAREEN, will respectfully request the Court's approval of the proposed and

1 unopposed PAGA Settlement Agreement of Plaintiff's individual claims and representative claim
2 for civil penalty claims under the Labor Code Private Attorney General Act (i.e., Labor Code section
3 2698 et seq., "PAGA").

4 The basis for this application is that the parties have reached and fully executed a PAGA
5 Settlement Agreement of the above-entitled case that disposes of the matter entirely, and one aspect
6 of Plaintiff's claims included a demand for relief under PAGA. Pursuant to Labor Code §2699(s)(2),
7 the settlement of PAGA claims requires court approval. Good cause exists for the Court to grant
8 this unopposed Motion as the proposed settlement is fair, adequate, and reasonable and in the best
9 interests of the Aggrieved Employees as a whole. Thus, the parties seek court approval of the PAGA
10 aspect of the settlement so that the matter may be dismissed entirely pursuant to the agreement of
11 the parties.

12 This application is based on this notice, the attached Memorandum of Points and
13 Authorities, the Declaration of Harris Emran, Esq., and all exhibits attached thereto, the PAGA
14 Settlement Agreement, as well as all records on file with this Court and such evidence or oral
15 argument as may be presented at the hearing.

16 As this motion is unopposed, the Parties respectfully relief from the page limit requirement
17 set forth by California Rules of Court, Rule 3.1113(d).

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19 DATED: August 27, 2025

EMRAN LAW

20 By: Harris Emran

21 Harris Emran

22 Attorney for PLAINTIFF and the Aggrieved
23 Employees
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