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Attorneys for Plaintiff
DALIA DELGADO

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DALIA DELGADO, on behalf of herself, and
all aggrieved employees,

Plaintiff,

v.

AVALON VILLA HEALTH CARE, LLC; and
DOES 1 through 100, inclusive,

Defendants.

Case No: 23STCV15615

*Assigned For All Purposes to
Judge Virginia Keeny*

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH PREJUDICE**

Date: March 26, 2025

Time: 8:30 a.m.

Dept. 45

Trial Date: TBD

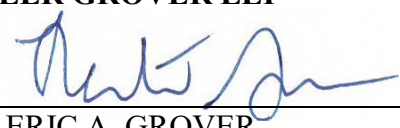
Complaint Filed: July 5, 2023

1 **PLEASE TAKE NOTICE THAT** on March 26, 2025 at 8:30 a.m., or as soon thereafter
2 as the matter may be heard, in Department 45 of the above-entitled Court, located at 111 North Hill
3 Street, Los Angeles, California 90012, Plaintiff Dalia Delgado (“Plaintiff”), will and hereby does
4 move unopposed for an Order: (1) granting approval, pursuant to California Labor Code §
5 2699(1)(2), of the proposed settlement of claims brought pursuant to the Labor Code Private
6 Attorneys General Act of 2004 (Labor Code §§ 2698 *et seq.*) against Defendant Avalon Villa Health
7 Care, Inc. set forth in the parties’ Labor Code Private Attorneys General Act Settlement Agreement
8 (the “Settlement Agreement”); (2) appointing Simpluris, Inc. as the Settlement Administrator; and
9 (3) directing disbursement of the Settlement Amount pursuant to the terms of the Settlement
10 Agreement.

11 This motion will be based on this Notice, the supporting memorandum of points and
12 authorities, the Settlement Agreement, the Declaration of Robert Spencer, the Declaration of Raul
13 Perez, the Declaration of Plaintiff Dalia Delgado, the documents and records on file in this matter,
14 and such additional arguments, authorities, and evidence and other matters as may be presented by
15 the Parties hereafter.

16
17 Dated: February 28, 2025

KELLER GROVER LLP

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19 By: 

20 ERIC A. GROVER
21 ROBERT SPENCER
22 *Counsel for Plaintiff*
23 DALIA DELGADO
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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **February 28, 2025**, in the case of *Dalia Delgado v. Avalon Villa Health Care, LLC*, Los Angeles Superior Court Case Number 23STCV15615, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ