

1 DAVID GLENN SPIVAK (SBN 179684)

2 david@spivaklaw.com

3 THE SPIVAK LAW FIRM

8605 Santa Monica Bl

4 PMB 42554

West Hollywood, CA 90069

Telephone: (213) 725-9094

5 Facsimile: (213) 634-2485

6 Attorney for Plaintiff(s),

7 TAYLOR SNOW, and all others similarly situated

(Additional attorneys for Plaintiff(s) on following page)

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF MONTEREY**

11 **(UNLIMITED JURISDICTION)**

12 TAYLOR SNOW, on behalf of herself and as an
13 “aggrieved employee” on behalf of other
14 “aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

15 *Plaintiff(s),*

16 vs.

17
18 555 OCEAN VIEW BLVD LLC (D/B/A
SEVEN GABLES INN), a California limited
19 liability company; KIRKWOOD
COLLECTION, INC., a California corporation;
20 KIRKWOOD COLLECTION HOLDINGS
LLC, a California limited liability company; and
21 DOES 1–50, inclusive,

22 *Defendant(s).*

Case No. 23CV001630

**NOTICE OF PLAINTIFF’S MOTION
AND MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Hearing Date: May 22, 2026

Hearing Time: 8:30 a.m.

Hearing Dept.: 14, The Honorable Ian A.
Rivamonte

Action filed: May 19, 2023

**Submitted Herewith Under Separate
Cover:**

1. Memorandum of Points and Authorities;
2. Declaration(s) of David Spivak, Taylor Snow, and Walter L. Haines; and
3. [Proposed] Order and Judgment Approving PAGA Settlement



SPIVAK LAW
EMPLOYEE RIGHTS

Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

Office:
1875 Century Park East
Fl 7
Los Angeles, CA 90067

ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

WALTER L. HAINES (SBN 71075)
walter@uelglaw.com
UNITED EMPLOYEES LAW GROUP
8605 Santa Monica Bl.
PMB 63354
West Hollywood, CA 90069
Telephone: (562) 256-1047
Facsimile: (562) 256-1006



SPIVAK LAW
EMPLOYEE RIGHTS

Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
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Los Angeles, CA 90067

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

2 PLEASE TAKE NOTICE that on May 22, 2026 at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department 14 of the Monterey County Superior Court, located at
4 Superior Court for the State of California, County of Monterey, 1200 Aguajito Rd CA, Monterey,
5 93940, Plaintiff Taylor Snow (“Plaintiff”) will and hereby does move this Court for an order
6 approving the PAGA Settlement Agreement (the “Settlement”)¹ between Plaintiff and Defendants
7 555 Ocean View Blvd LLC (D/B/A Seven Gables Inn), Kirkwood Collection, Inc., and Kirkwood
8 Collection Holdings LLC (collectively “Defendants”) (Plaintiff and Defendants are collectively
9 the “Parties).

10 The PAGA Settlement Agreement is on behalf of Taylor Snow and all current and former
11 hourly, non-exempt California employees Defendants 555 Ocean View Blvd LLC (D/B/A Seven
12 Gables Inn) employed at any time during the PAGA Period (the “Aggrieved Employees”). The
13 “PAGA Period” means the period from May 18, 2022 through September 08, 2025. Plaintiff
14 alleges that Defendants are liable to her and other Aggrieved Employees for unpaid wages,
15 unprovided meal and rest breaks, unreimbursed expenses, and any other Labor Code violations
16 that were alleged in the Action, or that could have been alleged in the Action based on the facts
17 alleged in the Action, which includes, but is not limited to, alleged violations of Labor Code
18 sections , and 2698 *et seq.* (“PAGA Released Claims”).

19 The Plaintiff seeks division of the \$180,000.00 Gross Settlement Amount as follows:

Item	Amount
PAGA Counsel Fees Payment	\$60,000.00
PAGA Counsel Litigation Expenses Payment	\$31,000.00
Administration Expenses Payment	\$12,500.00
PAGA civil penalties (Net Settlement Amount)	\$79,000.00
25% to Aggrieved Employees	\$19,750.00
75% to LWDA	\$59,250.00
Gross Settlement Amount	\$180,000.00

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28 ¹ The Settlement is attached as Exhibit 1 to the Declaration of David Spivak (“DS”), which is submitted herewith under a separate cover.



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1 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
2 Points and Authorities, the declarations of David Spivak, Taylor Snow, and Walter L. Haines, the
3 PAGA Settlement Agreement, all papers and pleadings on file with the Court in this action, all
4 matters judicially noticeable, and on such oral and documentary evidence as may be presented in
5 connection with the hearing on the Motion.

6 Respectfully submitted,

8 THE SPIVAK LAW FIRM

9 Dated: April 22, 2026

By:



10 DAVID SPIVAK,
11 Attorney for Plaintiff, TAYLOR
12 SNOW, and all others similarly
13 situated
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