

Eric K. Yaeckel [CSB No. 274608]
yaeckel@sullivanlawgroupapc.com

Ryan T. Kuhn [CSB No. 324538]
ryan@sullivanlawgroupapc.com

SULLIVAN & YAECKEL LAW GROUP, APC
2330 Third Avenue
San Diego, California 92101
(619) 702-6760 * (619) 702-6761 FAX

Attorneys for Plaintiff SANDRO ORTEGA-DOMINGUEZ, in a Representative capacity only, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

SANDRO ORTEGA-DOMINGUEZ, in a
Representative capacity only, and on behalf
of other members of the general public
similarly situated

Plaintiff

v.

RGC GASLAMP, LLC, a Delaware Limited
Liability Company; PENDRY SAN DIEGO,
LLC, a Delaware Limited Liability Company;
MONTAGE HOTELS & RESORTS, LLC; a
Nevada Limited Liability Company; and
DOES 1-10, inclusive

Defendants

CASE NO. 37-2023-00036893-CU-OE-CTL

**NOTICE OF PLAINTIFF'S UNOPPOSED
EX PARTE APPLICATION RE: PAGA
SETTLEMENT APPROVAL**

Date: February 19, 2025

Time: 8:30 a.m.

Dept: C-60

Judge: Hon. Matthew C. Braner

1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on February 19, 2025 at 8:30 a.m., or as soon thereafter as the
3 matter may be heard in Department C-60 of the San Diego Superior Court, 330 West Broadway, San
4 Diego, California 92101, the Honorable. Matthew C. Braner, presiding, Plaintiff SANDRO ORTEGA-
5 DOMINGUEZ, in a Representative capacity only, and on behalf of other members of the general
6 public similarly situated, seeks the Court's Approval of the recent PAGA settlement.

7 This application is based on this Notice, the Memorandum of Points and Authorities in support
8 thereof, the Declaration of Ryan T. Kuhn (including the attached Settlement Agreement), and the
9 Proposed Order and Judgment.

10 Copies of this *ex parte* application and all other papers filed herewith will be served on the
11 following attorneys of record electronically via the Court's one-legal system concurrent with the filing
12 of this application with the Court:

13 **PAUL HASTINGS LLP**
14 CHRIS A. JALIAN
chrisjalian@paulhastings.com
15 TERESA M. GREIDER
teresagreider@paulhastings.com
16 515 South Flower Street, Twenty-Fifth Floor
Los Angeles, California 90071-2228
17 Telephone: 1(213) 683-6000; Facsimile: 1(213) 627-0705
Attorneys for Defendants
18 PENDRY SAN DIEGO, LLC, MONTAGE HOTELS
& RESORTS, LLC and RGC GASLAMP, LLC

19 Dated: February 14, 2025

SULLIVAN & YAECKEL LAW GROUP, APC

21 _____
22 Eric K. Yaeckel
Ryan T. Kuhn
23 Attorneys for Plaintiff SANDRO ORTEGA-
DOMINGUEZ, in a Representative capacity only, and
24 on behalf of other members of the general public
similarly situated