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7 Attorneys for Plaintiff WALTER WALKER
8 on behalf of the State of California,
9 and others similarly situated and aggrieved

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 WALTER WALKER, on behalf of the State
of California, and others similarly situated
13 and aggrieved,

14 Plaintiff,

15 v.

16 PELICAN PRODUCTS, INC., a Delaware
17 Corporation; STAFFMARK INVESTMENT
LLC, a Delaware Limited Liability
18 Company; and DOES 1-100, inclusive,

19 Defendants.
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Case No.: 23STCV19531

Assigned for All Purposes to:
Hon. Richard L. Fruin
Dept. 15

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF SETTLEMENT
UNDER PRIVATE ATTORNEY'S
GENERAL ACT**

Date: November 14, 2024
Time: 9:15 a.m.
Dept.: 15

Reservation: 226528229837

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on November 14, 2024, at 9:15 a.m., or as soon thereafter
3 as the matter may be heard, in Department 15 of the above-captioned Court, located at 111 N. Hill
4 St., Los Angeles California, Plaintiff Walter Walker, 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 Simpluris, Inc. as the Settlement
9 Administrator and payment of its fees in the amount of \$3,500.00, approving a service award of
10 \$10,000 to Plaintiff Walker, and approving payment of Plaintiff's counsel's attorney's fees in the
11 amount of \$133,333.33 and costs in the amount of \$12,370.15.

12 This motion is brought under Labor Code section 2699(1)(2), and on the grounds that the
13 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
14 and the requested service award and attorney's fees and costs are fair and reasonable under the
15 circumstances of the case.

16 This motion is based upon this Notice of Motion and Motion, the accompanying
17 memorandum of points and authorities, the accompanying declarations of Chad Saunders, Walter
18 Walker, and Denise Islas, the Parties' PAGA Settlement Agreement filed herewith, the entire
19 Court file in this matter, and on such other argument and evidence as may be presented at or
20 before the hearing in this matter.

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22 Dated: October 9, 2024

CROSNER LEGAL, PC

23
24 By: 

25 Jamie Serb, Esq.
26 Brandon Brouillette, Esq.
27 Chad Saunders, Esq.
28 Zachary M. Crosner, Esq.
Attorneys for Plaintiff
WALTER WALKER