

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

Eduardo Garcia (State Bar #290572)

3990 Old Town Avenue, Suite C204

San Diego, CA 92110

Telephone: (619) 599-8292

Facsimile: (619) 599-8291

jlapyade@jcl-lawfirm.com

egarcia@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

Jackland K. Hom (State Bar #327243)

3990 Old Town Avenue, Suite C204

San Diego, CA 92110

Telephone: (619) 255-9047

Facsimile: (858) 404-9203

shani@zakaylaw.com

jackland@zakaylaw.com

Attorneys for Plaintiff LUIS ALBERTO LEDESMA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA BARBARA

LUIS ALBERTO LEDESMA, an individual
on behalf of himself and on behalf of other
Aggrieved Employees and the State of
California,

Plaintiff,

v.

TVJ SONS I, INC., a California corporation;
PORTER AND HOWARD, INC. (dba Toyota
of Santa Maria), a California Corporation; and
DOES 1-50, Inclusive,
Defendants.

Case No: 20CV03573

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Hearing Date: October 7, 2021

Hearing Time: 8:30 a.m.

Honorable Judge Jed Beebe
Department 4

Trial Date: Not Yet Set
Action Filed: October 29, 2020

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1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on October 7, 2021 on 8:30 a.m. or as soon
3 thereafter as the matter can be heard, in Department 4 of the above-entitled Court, before the
4 Honorable Judge Jed Beebe, Plaintiff LUIS ALBERTO LEDESMA (“Plaintiff”) will apply for an
5 order approving the PAGA settlement in accordance with Labor Code §2699(l). The proposed
6 settlement is set forth in the accompanying Private Attorney General Act (Labor Code Section
7 2698 *et seq.*) Settlement Agreement and Limited Release (the “Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points
9 and authorities, the Declaration of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the
10 Agreement between the parties, and the complete files and records in this action. All parties have
11 approved the Agreement and have met and conferred regarding the motion; therefore, this motion
12 is not opposed by Defendants. The Labor Workforce Development Agency has been served with
13 this motion and the Agreement as set forth in the accompanying proof of service. As this Motion
14 is unopposed, the Parties respectfully request relief from the page limit requirement set by
15 California Rules of Court, Rule 3.1113(d).

16 DATED: September 9, 2021

ZAKAY LAW GROUP, APLC

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18 By: 
19 Shani O. Zakay
20 Attorneys for Plaintiff
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