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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

STAR SUM, individually, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

A TEAM SECURITY, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No: CIVSB2324318

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Date: December 22, 2025

Time: 8:30am

Dept.: S37

Judge: Corey G. Lee

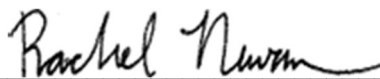
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on December 22, 2025, at 8:30 a.m. or as soon as
3 this matter may be heard in Department S37 of the above-entitled Court before the Honorable Judge
4 Corey G. Lee, Plaintiff Star Sum ("Plaintiff") will apply for an order approving the California Labor
5 Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor Code §2699.
6 The proposed settlement is set forth in the accompanying PAGA Settlement Agreement (the
7 "Settlement Agreement").

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

18 DATED: August 20, 2025

ZAKAY LAW GROUP, APLC

20 By: 
21 Rachel Newman, Esq.
22 Attorney for Plaintiff