

MARALLE MESSRELIAN (SBN 316974)
maralle@mmlawapc.com

MM LAW, APC
500 N. Brand Blvd., Ste 2000
Glendale, CA 91203
Telephone (818) 810-7747
Facsimile (818) 230-9018

Attorneys for Plaintiff,
ANDRES IBARRA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT
(UNLIMITED JURISDICTION)

ANDRES IBARRA,

Plaintiff,

vs.

STADCO, a California corporation; BRETT
MATTA, an individual; and DOES 1 to 25,
inclusive,

Defendants.

Case no.: 23STCV26591

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

Action filed: October 30, 2023
Hearing Date: October 8, 2024
Hearing Time: 8:30 a.m.
Hearing Dept: 76, Hon. Christopher K.
Lui

Reservation Number: 528939987841

Submitted Herewith Under Separate Cover:

1. Memorandum of Point and Authorities;
2. Declaration of Maralle Messrelian;
3. Declaration of Andres Ibarra;
4. Declaration of Michael Moore; and
5. [Proposed] Order and Judgment
Approving PAGA Settlement.

1 TO ALL PARTIES, THE CALIFORNIA LABOR AND WORKFORCE DEVELOPMENT
2 AGENCY, AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on October 8, 2024 at 8:30 a.m., or as soon thereafter as
4 the matter may be heard, in Department 76 of the Los Angeles County Superior Court, located at
5 111 N. Hill St. Los Angeles CA 90012, Plaintiff Andres Ibarra ("Plaintiff" or "Ibarra") will and
6 hereby does move this Court for an order approving the Private Attorneys General Act (Labor
7 Code § 2698 *et seq.*) Settlement Agreement (the "Agreement" or "PAGA Settlement") and
8 entering the [Proposed] Order and Judgment Approving PAGA Settlement.

9 The PAGA Settlement is on behalf of Ibarra and all persons within the State of California
10 who are or were employed with non-exempt status by Defendants STADCO and Bret Matta
11 (collectively, "Defendant" or "STADCO") from July 21, 2022, through the date this Court grants
12 approval of the Settlement Agreement (collectively, the "Aggrieved Employees"). Plaintiff alleges
13 that STADCO is liable to him and other Aggrieved Employees for (1) failure to compensate for
14 all hours worked, including minimum and overtime wages; (2) failure to provide accurate,
15 itemized wage statements; (3) failure to pay all wages owed during and at the end of employment;
16 (4) failure to maintain accurate records; (5) failure to provide rest breaks and meal periods; and
17 (6) failure to reimburse business expenses. Plaintiff has sought to impose civil penalties for
18 violations of Labor Code sections 201, 202, 203, 204, 204.1, 204.2, 226, 226.7, 510, 512, 558,
19 558.1, 1174, 1174.5, 1193.6, 1194, 1197, 1198, 2802, 2804, and IWC Wage Order No. 1, sections
20 2(E), 7, 11, and 12.

21 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
22 Points and Authorities, the declarations Maralle Messrelian, Andres Ibarra, and Michael Moore,
23 the PAGA Settlement, all papers and pleadings on file with the Court in this action, all matters
24 judicially noticeable, and on such oral and documentary evidence as may be presented in
25 connection with the hearing on the Motion.

26 Respectfully submitted,

27 MM LAW, APC

28 

Maralle Messrelian

Attorneys for Plaintiff, Andres Ibarra