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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SANTA BARBARA – SOUTH COUNTY**
10 **ANACAPA DIVISION**

11 ELIZABETH PETERSEN, on behalf of all
12 similarly situated persons and aggrieved
13 employees,

14 Plaintiffs,

15 vs.

16 SUNRUN, INC., and DOES 1-50,

17 Defendants.

CASE NO.: 26CV03332

[Assigned for all Purposes to the Hon. Thomas P.
Anderle, Dept. 3]

PLAINTIFF’S NOTICE OF MOTION AND
UNOPPOSED MOTION FOR ORDER:

1. GRANTING FINAL APPROVAL OF
PAGA SETTLEMENT
2. APPROVING REQUEST FOR
SETTLEMENT ADMINISTRATOR
COSTS
3. APPROVING REQUEST FOR
ATTORNEYS’ FEES AND COSTS;
AND,
4. APPROVING REQUEST FOR PAGA
REPRESENTATIVE ENHANCEMENT
PAYMENT

Date: July 1, 2026

Time: 10:00 a.m.

Dept: 3

Santa Barbara Superior Court
Anacapa Division
1100 Anacapa Street
Santa Barbara, CA 93101

1 TO THIS HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on July 1, 2026, at 10:00 a.m. or as soon thereafter as counsel
3 may be heard in Department 3 of the Santa Barbara Superior Court, Anacapa Division at 1100
4 Anacapa Street, Santa Barbara, CA 93101, Plaintiff Elizabeth Petersen ("Plaintiff") will move for an
5 Order: 1) Granting Final Approval of PAGA Settlement; 2) Approving Request for Settlement
6 Administrator Costs; 3) Approving Request for Attorneys' Fees and Costs; and 4) Approving Request
7 for PAGA Representative Enhancement Payment.

8 Plaintiff seeks final approval of the PAGA settlement, approving a request for the settlement
9 administrator fee of \$29,950.00, approving a request for attorneys' fees of \$973,500.00 and costs in
10 the amount of \$11,817.44 incurred by PAGA Counsel in prosecuting this action from inception
11 through final approval, and approving a request for a PAGA enhancement payment award in the
12 amount of \$10,000 for Plaintiff.

13 This motion is made on the grounds set forth in the accompanying materials. This Motion will
14 be based upon this notice, memorandum of points and authorities in support of Plaintiff's unopposed
15 motion for order: Granting Final Approval of PAGA Settlement; and Approving Request for
16 Settlement Administrator Costs, memorandum of points and authorities in support of Plaintiff's
17 unopposed motion for order: approving request for attorneys' fees and costs; and approving request
18 for PAGA representative enhancement payment, the attached declarations, and the complete files and
19 records in this action. A proposed order and judgment is lodged concurrently herewith.

20 **NATHAN & ASSOCIATES, APC**

21
22 Dated: June 1, 2026

By: /s/ Reuben D. Nathan
Reuben D. Nathan, Esq.
Attorney for Plaintiff,
Elizabeth Petersen