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8 Attorneys for Plaintiffs

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SAN DIEGO-CENTRAL DIVISION

11 CORINA POTTER, individually, on)
12 behalf of Aggrieved Employees, and as)
13 the State of California's designated)
14 proxy under the Private Attorneys)
15 General Act (PAGA) and on behalf of)
16 others,

17 Plaintiffs,

18 vs.

19 DOLLAR TREE STORES, INC., a)
20 Virginia corporation; and DOES 1)
21 through 50 inclusive)

22 Defendants.

Case No.: 37-2023-00047808-CU-OE-CTL

**NOTICE OF PLAINTIFFS'
UNOPPOSED MOTION AND
MOTION TO APPROVE PAGA
SETTLEMENT**

Hearing Date: Aug. 30, 2024

Hearing Time: 9:30 a.m.

Judge: Hon. Marcella O.
McLaughlin

Dept.: C-72

Comp. Filed: Nov. 2, 2023

Trial Date: TBA

**[Rutledge Declaration, Mem. of
P&As, and [Proposed] Order filed
concurrently herewith]**

1 TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on **August 30, 2024 at 9:30 a.m.** in Department
3 72 of the above-entitled court, located at 330 West Broadway, San Diego, California
4 92101, before the Hon. Marcella O. McLaughlin, Plaintiff Corina Potter, on behalf of
5 herself, similarly aggrieved employees, and as a proxy for the State of California
6 (collectively the “Plaintiffs”) will move and hereby do move the Court for an order
7 approving the parties’ Private Attorney General Act Settlement and Release (PAGA
8 Settlement Agreement), a copy of which is attached as **Exhibit 1** to the Declaration of
9 Thomas D. Rutledge filed concurrently herewith and incorporated herein by
10 reference.

11 This Motion is pursuant to Labor Code § 2699(l), which provides, “[t]he
12 superior court shall review and approve any [PAGA penalties] sought as part of a
13 proposed settlement agreement.” Good cause exists to grant this Motion because the
14 settlement is fair and reasonable.

15 This Motion is based upon this Notice, the pleadings in support thereof,
16 including but not limited to the Declaration of Thomas D. Rutledge, and the records
17 in the Court’s file in this action, and upon such further evidence and argument the
18 Court may request.

19 Dated: August 5, 2024

Law Office of Thomas D. Rutledge

21 By: Thomas D. Rutledge
22 /s/Thomas D. Rutledge, Esq.
23 Attorneys for Plaintiffs
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PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

I, THOMAS D. RUTLEDGE, the undersigned, am employed in the County of San Diego, State of California; I am over the age of 18 and not a party to the within action; my business address is 16956 Via de Santa Fe, Suite 1847, Rancho Santa Fe, California 92091-4606.

On August 5, 2024, I served the foregoing document(s) described as:

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

on the interested parties to this action by placing a copy thereof enclosed in a sealed envelope addressed as follows: **See Attached List.**

☐ (BY MAIL) I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence was deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in San Diego, California.

☒ (BY E-MAIL) I am readily familiar with the business practice for collection and processing of correspondence for emailing. This correspondence was sent via email to the recipients' business email addresses identified above.

☐ (BY OVERNIGHT DELIVERY SERVICE) I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows. I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth above, with fees for overnight delivery paid or provided for.

☐ (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

Executed August 5, 2024, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

THOMAS D. RUTLEDGE
/s/THOMAS D. RUTLEDGE

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