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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LUIS A. RENDON, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

HEALTHCARE INVESTMENTS, INC. (dba
Rosecrans Care Center), a California
Corporation; and Does 1 through 50, Inclusive,

Defendants.

Case No: 20STCV39775

Action Filed: October 10, 2020

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

Date: May 31, 2022

Time: 8:30 a.m.

Reservation ID: 162345658677

Dept.: 72

Judge: Hon. Curtis A. Kin

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

2 YOU ARE HEREBY NOTIFIED THAT on May 31, 2022 at 8:30 a.m., or as soon thereafter
3 as the matter can be heard, in Department 72 of the above-entitled Court, before the Honorable Judge
4 Curtis Kin, Plaintiff LUIS A. RENDON ("Plaintiff") will apply for an order approving the PAGA
5 settlement in accordance with Labor Code §2699(l). The proposed settlement is set forth in the
6 accompanying Private Attorney General Act (Labor Code Section 2698 *et seq.*) Stipulation of
7 Settlement of PAGA Claims and Release of PAGA Claims (the "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 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 is
12 not opposed by Defendant. The Labor Workforce Development Agency has been served with this
13 motion and the Agreement as set forth in the accompanying Declaration of Shani O. Zakay. As this
14 Motion 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: May 5, 2022
17

18 **ZAKAY LAW GROUP, APLC**

19 By:  _____

20 Shani O. Zakay
21 Attorneys for Plaintiff
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Court Reservation Receipt

Reservation

Reservation ID: 162345658677	Status: RESERVED
Reservation Type: Motion re: (Approval of PAGA Settlement)	Number of Motions: 1
Case Number: 20STCV39775	Case Title: LUIE A RENDON vs HEALTHCARE INVESTMENTS, INC., A CALIFORNIA CORPORATION
Filing Party: Luis A. Rendon (Plaintiff)	Location: Stanley Mosk Courthouse - Department 72
Date/Time: May 31st 2022, 8:30AM	Confirmation Code: CR-OJA7DPIYSS6TVFHB4

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
TOTAL			\$61.65

Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX7349	Authorization: 08651G

[◀ Back to Main](#)

Print Page