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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

BRANDON MARTIN, an individual, on behalf
of himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

SAN ANTONIO POST ACUTE LLC, a
California limited liability company; and DOES
1-50, Inclusive,

Defendants.

Case No: CIVSB2317704

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

Date: October 28, 2024
Time: 8:30 a.m.

Judge: Hon. Jeffrey R. Erickson
Dept.: S14

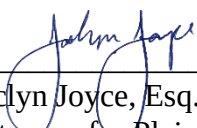
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on October 28, 2024, at 8:30 a.m. or as soon as this
3 matter may be heard in Courtroom S14 of the above-entitled Court before the Honorable Judge
4 Jeffrey R. Erickson, Plaintiff Brandon Martin ("Plaintiff") will apply for an order approving the
5 California Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor
6 Code §2699. The proposed settlement is set forth in the accompanying PAGA Settlement Agreement
7 (the "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 the Plaintiff, the Declaration of the Settlement Administrator, the Settlement
11 Agreement between the parties, and the complete files and records in this action. All parties have
12 approved the Settlement Agreement and have met and conferred regarding the motion; therefore, this
13 motion is not opposed by Defendant. The Labor Workforce Development Agency has been served
14 with this motion and the Settlement Agreement as set forth in the accompanying Declaration of Jean-
15 Claude Lapuyade. As this Motion is unopposed, the Parties respectfully request relief from the page
16 limit requirement set by California Rules of Court, Rule 3.1113(d).

17 DATED: August 8, 2024

ZAKAY LAW GROUP, APLC

19 By: 
20 Jaclyn Joyce, Esq.
21 Attorney for Plaintiff