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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE**

NORMA REYES, on behalf of herself, other
Aggrieved Employees, and the State of
California,

Plaintiff,

v.

SIMPSON GARDEN GROVE, INC. (dba
Simpson Chevrolet of Garden Grove); and
DOES 1-50, Inclusive,

Defendants.

Case No: 30-2020-01175614-CU-OE-CJC

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

Hearing Date: May 12, 2021
Hearing Time: 10:00 AM
Reservation No.: 73502141

Honorable Judge Fred W. Slaughter
Department C64

Trial Date: August 22, 2022
Action Filed: December 22, 2020

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00AM on May 12, 2021, or as soon
3 thereafter as the matter can be heard, in Department C64 of the above entitled Court, before the
4 Honorable Judge Fred W. Slaughter, Plaintiff NORMA REYES (“Plaintiff”) will apply for an
5 order approving the PAGA settlement in accordance with Labor Code §2699(l). The proposed
6 settlement is set forth in the accompanying Private Attorney General Act (Labor Code Section
7 2698 *et seq.*) Settlement Agreement and Limited Release (the “Agreement”).

8 This motion will be based on this notice of motion and motion, the accompanying points
9 and authorities, the Declaration of Shani O. Zakay, the Agreement between the parties, and the
10 complete files and records in this action. All parties have approved the Agreement and have met
11 and conferred regarding the motion; therefore, this motion is not opposed by Defendants. The
12 Labor Workforce Development Agency has been served with this motion and the Agreement as
13 set forth in the accompanying proof of service. As this Motion is unopposed, the Parties
14 respectfully request relief from the page limit requirement set by California Rules of Court, Rule
15 3.1113(d).

16 DATED: April 2, 2021

ZAKAY LAW GROUP, APLC

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18 By: 
19 Shani O. Zakay
20 Attorneys for Plaintiff
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