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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

10 STEVE PAURA, on behalf of the State of
California, and others similarly situated and
11 aggrieved,

12 Plaintiff,

13 v.

14 CENTINELA FEED, INC.; and DOES 1-100,
15 inclusive,

16 Defendants.

Case No.: 23STCV28435

Assigned for all purposes to
Hon. Christopher Lui
Dept. 76

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT**

Date: May 27, 2025
Time: 8:30 AM
Dept.: 76
Reservation ID:612307738243

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on May 27, 2025, at 8:30 am, in Department 76 of the Los
3 Angeles County Superior Court, located at 111 N. Hill Street, Los Angeles, California, Plaintiff
4 Steve Paura, on behalf of himself and the State of California by and through the Labor Workforce &
5 Development Agency, will and hereby does move the Court for an order granting approval of the
6 proposed settlement under the Private Attorneys General Act, Labor Code sections 2698, *et seq.*,
7 approving the payment of civil penalties to the State and the Aggrieved Employees, approving
8 Simpuris, Inc. as the Settlement Administrator and payment of its fees in the amount up to
9 \$3,000.00, approving an enhancement payment to Plaintiff in the amount of \$10,000.00, and
10 approving payment of Plaintiff's counsel's attorney's fees in the amount of \$83,333.33 and costs in
11 the amount of \$8,912.75.

12 This motion is brought under Labor Code section 2699(1)(2), and on the grounds that the
13 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
14 and the requested enhancements, attorney's fees and costs are fair and reasonable under the
15 circumstances of the case.

16 This motion is based upon this Notice of Motion and Motion, the accompanying
17 memorandum of points and authorities, the accompanying declarations of Chad Saunders, Steve
18 Paura, and Eric Springer, the entire Court file in this matter, and on such other argument and
19 evidence as may be presented at or before the hearing in this matter.

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21 Dated: January 22, 2025

CROSNER LEGAL, P.C.

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24 Zachary Crosner
25 Chad Saunders
26 Attorneys for Plaintiff Steve Paura
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