

Joseph W. Rose, Bar No. 232261
joe@joeroselaw.com
Mehran Tahoori, Bar No. 283313
mehran@joeroselaw.com
ROSE LAW, APC
4092 Bridge Street
Fair Oaks, California 95628
Telephone: (916) 273-1260
Facsimile: (916) 290-0148

Michael E. Velarde, Bar No. 266272
mvelarde@michaelvelardelaw.com
VELARDE & VELARDE
19200 Von Karman Ave., Suite 400
Irvine, California 92612
Telephone: (949) 492-4241
Facsimile: (949) 606-7168

Attorneys for Plaintiff
GARRETT EHRITT

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF VENTURA**

GARRETT EHRITT,

Plaintiff,

v.

BLACKPOINTE GROUP CONSTRUCTION &
MANAGEMENT, INC., A CALIFORNIA
CORPORATION,
LAUREL J. SCHITONE;
VICTOR A. SCHITONE; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 2023CUWT016864

**PLAINTIFF'S NOTICE OF UNOPPOSED
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Complaint Filed: November 27, 2023
Department: 40
Judge: Hon. Mark S. Borrell

[Filed concurrently with Memorandum of Points
and Authorities in Support of Motion, Declaration
of Joseph W. Rose, and Proposed Order]

Motion Hearing Date: October 23, 2025
Motion Hearing Time: 8:30 a.m.

NOTICE TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

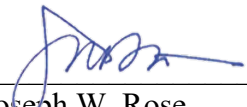
Please take notice that on October 23, 2025 at 8:30 a.m. in Department 40 of the Ventura Courthouse, Hall of Justice, located at 800 S Victoria Ave, Ventura, CA 93003, Plaintiff Garrett Ehritt ("Plaintiff") will and hereby does move the Court to grant approval of the PAGA settlement in this matter and approve the attorney's fee award, cost award, incentive payments, and other terms of the parties PAGA (i.e., California Private Attorneys General Act, Labor Code §§ 2698, *et seq.*) Settlement

1 Agreement (the “PAGA Settlement”). This motion is supported by the Declaration of Joseph Rose,
2 Memorandum of Points and Authorities, the PAGA Settlement and the [Proposed] Order and Judgment,
3 all filed and served herewith, and any argument presented at the time of hearing. This motion is
4 unopposed.

5 Dated: September 19, 2023

ROSE LAW, APC

6
7 By:



Joseph W. Rose
Attorneys for Plaintiff,
GARRETT EHRLIT

PROOF OF SERVICE

I, the undersigned, declare as follows:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen and not a party to the within action; my business address is 4092 Bridge Street, Fair Oaks, California, 95628, in said County and State. On September 9, 2025, I served the following documents:

1. **NOTICE OF MOTION FOR APPROVAL OF PAGA SETTLEMENT**
2. **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT**
3. **DECLARATION OF JOSEPH W. ROSE IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT**
4. **[PROPOSED] ORDER APPROVING PAGA SETTLEMENT**

on the parties state below, by the following means of service:

Jennifer N. Lutz, Esq.,
PETTIT KOHN INGRASSIA LUTZ &
DOLIN PC
11622 El Camino Real, Suite 300
San Diego, CA 92130
Telephone: (858) 755-8500
Facsimile: (858) 755-8504
E-mail: jlutz@pettitkohn.com

Attorneys for Defendants
BLACKPOINTE GROUP
CONSTRUCTION & MANAGEMENT,
INC., a California corporation, LAUREL J.
SCHITONE; and VICTOR A. SCHITTON

☒ **BY ELECTRONIC SERVICE:** On the above-mentioned date by 5:00 p.m., based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses as shown above.

☒ I am employed in the office of Joseph W. Rose, a member of the bar of this court, and that the foregoing document(s) was(were) printed on recycled paper.

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☐ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 19, 2025.

Lindsay Ironside