

08/19/2026

K. Bieker

Executive Officer and Clerk

By: _____


Joan Foster

Deputy Clerk

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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

NATALI GODINEZ ZUNIGA,
individually, and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

CROWN DODGE, a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 2023CUOE017631

Honorable Charmaine H. Buehner
Department 44

**SUPPLEMENTAL DECLARATION OF
CHARLES T. SWEENY IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL
ACT SETTLEMENT AGREEMENT**

Hearing Date: August 26, 2026
Hearing Time: 1:30 P.M.
Department: 44

Complaint Filed: December 11, 2023
Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF CHARLES T. SWEENY**

2 I, Charles T. Sweeny, hereby declare as follows:

3 1. I am an attorney licensed to practice law in the State of California. I am a member
4 of Sweeny Law, PC, who, along with Lawyers *for* Justice, PC, are attorneys of record for
5 Plaintiff Natali Godinez Zuniga (“Plaintiff”). The facts set forth in this declaration are within
6 my personal knowledge or based on information and belief and, if called as a witness, I could
7 and would competently testify thereto.

8 2. On June 4, 2026, I submitted the proposed settlement to the LWDA and received
9 a confirmatory email from the LWDA confirming submission at approximately 10:56 PM, a
10 true and correct copy of which is attached to the hereto as “**Exhibit A.**”

11 3. I am not aware of any interest held by Plaintiff, Plaintiff’s Counsel, Defendant, or
12 its counsel in the Greg E. Knoll Justice Gap Fund.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed this Eighteenth day of August, 2026, at Los Angeles, California.

18 

19 _____
Charles T. Sweeny

EXHIBIT A



Charlie Sweeny <charlie@sweenylaw.com>

Thank you for your Proposed Settlement Submission

1 message

no-reply@formassembly.com <no-reply@formassembly.com>
To: charlie@sweenylaw.com

Thu, Jun 4, 2026 at 10:57 PM

06/04/2026 10:56:13 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

On 06/04/2026 10:56:13 PM your Proposed Settlement was successfully processed for case number LWDA-CM-985319-23

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm