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Attorney for Plaintiff,
LAURA CECILIA ZARATE RAMIREZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

LAURA CECILIA ZARATE RAMIREZ, an individual,

Plaintiff,

v.

AMERICAN ASSETS TRUST, INC., a foreign corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24CL031156C

Assigned for all purposes to the Hon. Michael T. Smyth, Dept. C-67

PLAINTIFF'S NOTICE OF UNOPPOSED MOTION AND MOTION FOR APPROVAL OF PAGA SETTLEMENT AND ENTRY OF JUDGMENT

IMAGED FILE

Hearing:
Date: May 14, 2027
Time: 9:00 a.m.
Dept.: C-67

[*Filed concurrently with Plaintiff's Memorandum of Points and Authorities; Declaration of Hugo Ivan Salazar; Declaration of Laura Cecilia Zarate Ramirez; and [Proposed] Order and Judgment*]

Complaint Filed: December 30, 2024
FAC Filed: August 28, 2026
Trial Date: None set

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on May 14, 2027, at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department C-67 of the above-entitled Court, located at 330 West

Broadway, San Diego, California 92101, the Honorable Michael T. Smyth presiding, Plaintiff Laura Cecilia Zarate Ramirez ("Plaintiff") will and hereby does move the Court, pursuant to Labor Code section 2699, subdivision (s)(2), for an order approving the settlement of the Private Attorneys General Act ("PAGA") claim in this action and entering judgment.

Through this Motion, Plaintiff respectfully requests that the Court enter the concurrently lodged [Proposed] Order and Judgment:

1. Approving the PAGA Settlement Agreement between Plaintiff and Defendant American Assets Trust, Inc. ("Defendant"), providing for a non-reversionary Gross Settlement Amount of $35,000.00, as fair, reasonable, and adequate in light of PAGA's purposes;
2. Approving payment of PAGA Penalties in the amount of 65% ($19, 175) to the California Labor and Workforce Development Agency ("LWDA") and 35% ($10,325) to the Aggrieved Employees;
3. Approving a Service Award to Plaintiff in the amount of $2,500.00;
4. Approving settlement administration costs to Apex Class Action in an amount not to exceed $3,000;
5. Noting that Plaintiff's counsel seeks no attorneys' fees or costs from the settlement; and
6. Entering judgment in accordance with the PAGA Settlement Agreement and retaining jurisdiction pursuant to Code of Civil Procedure section 664.6.

This Motion is unopposed. Defendant has agreed not to oppose the Motion as part of the settlement.

The Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities, the Declaration of Hugo Ivan Salazar and exhibits thereto, the Declaration of Laura Cecilia Zarate Ramirez, the [Proposed] Order and Judgment, the pleadings and records on file in this action, and such further evidence and argument as the Court may consider.

Pursuant to Labor Code section 2699, subdivision (s)(2), a copy of the proposed settlement is being submitted to the LWDA concurrently with the filing of this Motion.

Dated: October 21, 2026

SALAZAR LAW GROUP, APC

By: 

HUGO IVAN SALAZAR
Attorney for Plaintiff,
LAURA CECILIA ZARATE RAMIREZ