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13 Attorneys for Plaintiff Keith Brooks

14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA

17 Keith Brooks, an individual, on behalf of
18 himself and all others similarly situated
19 and as a private attorney general pursuant
20 to the Private Attorneys General Act,

21 Plaintiff,

22 vs.

23 Burlington Coat Factory Warehouse
24 Corporation, Burlington Coat Factory of
25 Texas, Inc., and Does 1 through 10,

26 Defendants.

Case No. 5:24-CV-0041-SRM-SHK

**Notice of Motion for Order
Approving PAGA Settlement**

Date: October 22, 2025
Time: 1:30 p.m.
Crtrm: 5D

PLEASE TAKE NOTICE that on October 22, 2025 at 8:30 a.m. in Department 5D of the above-entitled court located at 350 W 1st Street, Courtroom 5D, Los Angeles, CA 90012-4565, Plaintiff Keith Brooks will and hereby does move for entry of an Order approving the terms of the PAGA settlement as set forth in the PAGA Settlement Agreement, a copy of which is attached as ***Exhibit 1*** to the Declaration of Lonnie C. Blanchard III filed herewith.

This Motion is based on this Notice, the supporting Memorandum of Points and Authorities, the Declarations of Lonnie C. Blanchard III, Lars Kindem, Keith Brooks, and the pleadings and papers on file in this action, and any other matter of which the Court may take notice.

Dated: September 15, 2025 THE BLANCHARD LAW GROUP, APC

BY: S/LONNIE C. BLANCHARD III
LONNIE C. BLANCHARD III
Attorneys for Plaintiff Keith Brooks