

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

02/24/2025 at 08:55:47 AM

By: Darnekia Oliver,
Deputy Clerk

Joe Bautista (State Bar No. 255708)
Nina Montoya (State Bar No. 237419)
Shannon Seibert (State Bar No. 240317)
SEIBERT • BAUTISTA • MONTOYA
2100 Embarcadero, Suite 203
Oakland, CA 94606
Telephone: 510.679.1981
Facsimile: 510.679.1982

Attorneys for Plaintiff Mary Lyn Teodoro

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA – UNLIMITED JURISDICTION

MARY LYN TEODORO,

Plaintiff,

vs.

SILVERMAN & LIGHT, INC., a California
Corporation; **CHRIS SILVERMAN,** an
Individual; **CARROLL BURDETT,** an
Individual; and **DOES 1 – 10,** inclusive,

Defendants.

CASE NO.: 24CV063449

**NOTICE OF MOTION AND MOTION FOR
ORDER APPROVING PAGA
SETTLEMENT**

Reservation No. 431635626722

[Filed concurrently with Memorandum of Points
and Authorities in Support of Plaintiff's Motion;
Declaration of Joe Bautista in Support of Motion;
Proposed Order]

Date: April 23, 2025

Time: 3:00 p.m.

Dept.: 17

Complaint Filed: February 9, 2024

Trial Date: January 19, 2026

Assigned for all Purposes to the
Honorable Sarah Sandford-Smith (Dept. 17)

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

2 YOU ARE HEREBY NOTIFIED THAT at 3:00 p.m. on March 27, 2025 in Department 17
3 of this Court, or as soon thereafter as the matter can be heard, Plaintiff MARY LYN TEODORO
4 will move this Court for an order approving the PAGA settlement.

5 This motion is made on the ground that Plaintiff and Defendants have entered into a
6 settlement agreement with respect to all parties and for all causes of action and seek this Court's
7 approval of settlement of the PAGA claims under Labor Code section 2699(s)(2), former subd.
8 (1)(2).

9 Plaintiff's Complaint included two (2) causes of action under PAGA, which the parties seek
10 to dismiss per the terms of the Settlement Agreement. Under California Labor Code section
11 2699(s)(2), former subd. (1)(2), the Superior Court shall review and approve the settlement of any
12 civil claims for penalties under PAGA. California Labor Code section 2699(s)(2) does not prescribe
13 any specific procedure for how to request court approval of a PAGA settlement, nor is there any
14 requirement for notice in the statute.

15 This motion is unopposed, and all parties have executed a Joint Stipulation for Order
16 Approving PAGA Settlement, which is filed concurrently with this motion.

17 The motion will be based on this Notice of Motion, the attached Memorandum of Points and
18 Authorities, the Declaration of Joe Bautista, and on such other oral and documentary evidence as
19 may be presented at the hearing of the motion.
20

21 Dated: February 21, 2025

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25 Joe Bautista
26 Attorneys for Plaintiff Mary Lyn Teodoro
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