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9 **SUPERIOR COURT OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF RIVERSIDE**

11 TERRY TAYLOR, on behalf of the State of
12 California and all Aggrieved Employees,

13 Plaintiff,

14 v.

15
16 UNITED FACILITIES, INC., an Illinois
Corporation; and DOES 1-100,
17 inclusive,

18 Defendants.

Case No.: CVRI2400946

Assigned for All Purposes to:
Hon. Harold Hopp
Dept. 1

NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT

Date: July 8, 2025
Time: 8:30 a.m.
Dept.: 1

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1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on July 8, 2025, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department 1 of the above-captioned Court, located at 4050 Main
4 St., Riverside, California, Plaintiff Terry Taylor, on behalf of himself and the State of California
5 by and through the Labor Workforce & Development Agency, will and hereby does move the
6 Court for an order granting approval of the proposed settlement under the Private Attorneys
7 General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil penalties to the
8 State and the Aggrieved Employees, approving Phoenix Settlement Administrators as the
9 Settlement Administrator and payment of its fees in the amount of \$4,500.00, and approving
10 payment of Plaintiff's counsel's attorney's fees in the amount of \$113,333.33 and costs in the
11 amount of \$16,727.93.

12 This motion is brought under Labor Code section 2699(l)(2), and on the grounds that the
13 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
14 and the requested service award and attorney's fees and costs are fair and reasonable under the
15 circumstances of the case.

16 This motion is based upon this Notice of Motion and Motion, the accompanying
17 memorandum of points and authorities, the accompanying declarations of Chad Saunders,
18 Michael Moore, and Terry Taylor, the Parties' PAGA Settlement Agreement filed herewith, the
19 entire Court file in this matter, and on such other argument and evidence as may be presented at
20 or before the hearing in this matter.

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22 Dated: May 29, 2025

CROSNER LEGAL, PC

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25 Brandon Brouillette
26 Chad Saunders
27 Zachary M. Crosner
28 Attorneys for Plaintiff TERRY TAYLOR