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Attorneys for Plaintiff RANDY GOAD

**SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA**

RANDY GOAD, on behalf of the State of
California and all Aggrieved Employees,

Plaintiff,

v.

SRG OPERATING, INC., a Delaware
Corporation; SENIOR RESOURCE GROUP
LLC, a Delaware Limited Liability
Company; SRG PARTNERS, LLC, a
Delaware Limited Liability Company; SRG
PARTNERS COMMUNITIES
INVESTMENT CO, LLC, a Delaware
Limited Liability Company; and DOES 1-
100, inclusive,

Defendants.

CASE NO. 24CV00643

Assigned for All Purposes to:
Hon. Donna Geck
Dept. 4

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

Date: September 12, 2025
Time: 10: 00 a.m.
Dept.: 4

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

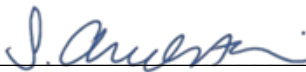
2 PLEASE TAKE NOTICE that on September 12, 2025, at 8:30 a.m., or as soon thereafter
3 as the matter may be heard, in Department 4 of the above-captioned Court, located at 1100
4 Anacapa St., Santa Barbara, California, Plaintiff Randy Goad, on behalf of himself and the
5 State of California by and through the Labor Workforce & Development Agency, will and hereby
6 does move the Court for an order granting approval of the proposed settlement under the Private
7 Attorneys General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil
8 penalties to the State and the Aggrieved Employees, approving Phoenix Settlement
9 Administrators as the Settlement Administrator and payment of its fees in the amount of
10 \$225,000, approving an enhancement award of \$2,500 to Plaintiff, and approving payment of
11 Plaintiff's counsel's attorney's fees in the amount of \$18,118.69 and costs in the amount of \$.

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 J. Kirk Donnelly, Jodey
18 Lawrence, and Randy Goad, the Parties' PAGA Settlement Agreement filed herewith, the entire
19 Court file in this matter, and on such other argument and evidence as may be presented at or
20 before the hearing in this matter.

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22 Dated: May 12, 2025

CROSNER LEGAL, PC

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25 Sepideh Ardestani
26 Jamie K. Serb
27 Zachary M. Crosner
28 Attorneys for Plaintiff RANDY GOAD