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SHAUNA STALNAKER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SAN DIEGO**

SHAUNA STALNAKER, an individual  
and on behalf of other aggrieved  
employees,

Plaintiffs,

vs.

BLUE PACIFIC ENGINEERING AND  
CONSTRUCTION, INC., a California  
corporation, SHAHRAM ELIHU, an  
individual, and DOES 1 through 50,  
inclusive,

Defendants.

CASE NO. 37-2024-00022124-CU-WT-CTL

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

Date: October 16, 2026  
Time: 10:30 a.m.  
Dept: C-70  
Judge: Hon. Carolyn Caietti

Action Filed: May 13, 2024  
Trial Date: Not Set

**RESERVATION NO.: 101143**

**TO THE COURT, DEFENDANTS, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on October 16, 2026 at 10:30 a.m., before the Honorable Carolyn M. Caietti in Department C-70 of the Superior Court of San Diego, located at 330 W Broadway, San Diego, CA 92101, Plaintiff Shauna Stalnaker ("Plaintiff") will and hereby does move this Court for an Order granting approval of the Private Attorneys General Act of 2004, California Labor Code § 2698 *et seq.* ("PAGA") representative action settlement and entering judgment pursuant to C.C.P. section 664.6.

This Motion will be based upon this Notice, the Memorandum of Points and Authorities, the Declaration of David D. Cardone, the Declaration of Jodey Lawrence, and exhibits filed herewith, and any additional papers or arguments submitted on or before the hearing on the Motion.

Dated: March 18, 2026

DUNN DESANTIS WALT & KENDRICK, LLP

By:



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Shauna Stalnaker