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Attorneys for Plaintiff JAIME DOJAQUEZ,
an individual and as proxy for the Labor and
Workforce Development Agency

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KERN

JAIME DOJAQUEZ, an individual and
as proxy for the Labor and Workforce
Development Agency

Plaintiff,

vs.

KERN RIVER CONSULTING, INC., a
corporation; SME STEEL
CONTRACTORS, INC., a corporation;
SOUTHWEST STEEL OF
CALIFORNIA, INC., a corporation;
JAMES RIVERA, an individual, and
DOES 1-100, inclusive,

Defendants.

CASE NO: BCV-24-101168

NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT

Date:
Time:
Dept.:

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on _____, 2024 at _____ in Department ____ of
the above-captioned Court, located at 1415 Truxtun Avenue, Bakersfield, California 93301, or as
soon thereafter as this matter may be heard, Plaintiff Jaime Dojaquez ("Plaintiff") will and hereby
does move pursuant to Labor Code section 2699(1)(2) for approval of the settlement reached
between Plaintiff and Defendants of Plaintiff's claims under the Labor Code Private Attorneys

1 General Act of 2004 (“PAGA”). Defendant does not oppose the instant Motion.

2 This motion shall be based on this Notice of Motion, Plaintiff’s Memorandum of Points and
3 Authorities in Support, the Declaration of Vladimir J. Kozina, the Proposed Order Approving
4 PAGA Settlement, all filed concurrently herewith, and upon such other and further evidence and
5 argument as may be presented at the hearing on this motion.

6 DATED: December 4, 2024

MAYALL HURLEY, P.C.

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9 By:

10 ROBERT J. WASSERMANN
11 VLADIMIR J. KOZINA
12 Attorneys for Plaintiff
13 JAIME DOJAQUEZ
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