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Attorneys for Plaintiff
LUKAS NOURI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

LUKAS NOURI,

Plaintiff,

vs.

SUNSET ATHLETIC CLUB, LLC (a California
limited liability company) dba MONARCH
ATHLETIC CLUB; RYAN GREENE (an
individual); and MONARCH BRENTWOOD LLC
(a California limited liability company)

Defendants.

Case No. 24STCV01585

Reservation ID No. 888036187393

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION IN SUPPORT OF
STIPULATION TO APPROVE PAGA
SETTLEMENT**

Date and Time: February 11, 2026. 8:30 am
Dept: 19
Judge: Hon. Dooren B. Boxer

Filed concurrently with:

- (1) Stipulation to Approve PAGA Settlement
and Memo of Point and Authorities;
 - (2) Declaration of Amy S. Ramsey;
 - (3) Declaration of William E. Stoner;
 - (4) Declaration of Lisa Mullins of IYLM
Group;
 - (5) Declaration of Lukas Nouri;
 - (6) [Proposed] Order
- Complaint filed: January 22, 2024

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3 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD, NOTICE IS**
4 **HEREBY GIVEN** that on February 11, 2026 at 8:30 a.m., or as soon thereafter as the matter may
5 be heard in Department 19 of the above-referenced Court, located at 111 North Hill Street, Los
6 Angeles California 90012, Plaintiff Lukas Nouri will, and hereby does, present this Stipulation to
7 Approve PAGA settlement under Labor Code Section 2699 ("PAGA"), for the following Order
8 and Judgment:

- 9
- 10 1. The stipulated PAGA settlement is approved.
 - 11 2. Plaintiff's Counsel shall be awarded \$15,150.
 - 12 3. The remainder of the Gross Settlement Amount shall be used to pay administration
13 costs, pay the LWDA, and then shall be distributed to the Aggrieved Employees with a
14 Notice of PAGA Settlement, as provided for in the Settlement Agreement.

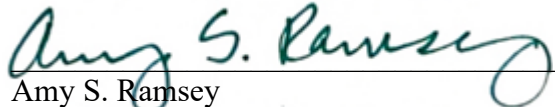
15 This Motion is based on this Notice of Motion, the concurrently filed Stipulation to
16 Approve PAGA Settlement and Memorandum of Points and Authorities; Supporting Declarations;
17 Proposed Order, and all pleadings, papers, documents, and records on file herein, and such oral
18 and other documentary evidence and argument as may be presented at the time of the hearing.

19 Respectfully submitted,

20 DATED: January 14, 2026

ADVANTAGE ADVOCATES, P.C.

21 By:

22 
23 Amy S. Ramsey
24 Attorney for Plaintiff LUKAS NOURI
25
26
27
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Make a Reservation

LUKAS NOURI vs SUNSET ATHLETIC CLUB, LLC (A CALIFORNIA LIMITED LIABILITY COMPANY), et al.

Case Number: 24STCV01585 Case Type: Civil Unlimited Category: Other Employment Complaint Case
Date Filed: 2024-01-22 Location: Stanley Mosk Courthouse - Department 19

Reservation	
Case Name: LUKAS NOURI vs SUNSET ATHLETIC CLUB, LLC (A CALIFORNIA LIMITED LIABILITY COMPANY), et al.	Case Number: 24STCV01585
Type: Motion for Order (Motion for Approval of PAGA Settlement)	Status: RESERVED
Filing Party: Lukas Nouri (Plaintiff)	Location: Stanley Mosk Courthouse - Department 19
Date/Time: 02/11/2026 8:30 AM	Number of Motions: 1
Reservation ID: 888036187393	Confirmation Code: CR-GGWQWE4WV4T7ZCOKP

Fees			
Description	Fee	Qty	Amount
Motion for Order (name extension)	0.00	1	0.00
TOTAL			\$0.00

Payment	
Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

1 **PROOF OF SERVICE**

2 I, Amy S. Ramsey, hereby declare and state that:

3 I am over the age of eighteen years, employed in the County of Los Angeles,
4 California, and not a party to the within action. My business address is: 21 Miller Alley,
Pasadena, CA 91103.

5 On January 14, 2026, I served copies of the following document described as:

6 **PLAINTIFF'S NOTICE OF MOTION AND MOTION IN SUPPORT OF STIPULATION TO**
7 **APPROVE PAGA SETTLEMENT** on the interested party in this action as follows:

8 Kevin Allen
9 kallen@grsm.com
10 Debra Meppen
11 dmeppen@grsm.com
12 Michelle Smith
13 mxsmith@grsm.com
14 Neo Chen
neochen@grsm.com
Dina Glucksman
dglucksman@grsm.com
633 West 5th Street, 52nd Floor, Los Angeles, CA 90071
Attorneys for Defendant

15 ☒ BY E-SERVICE: By transmitting via email, per CCP §1010.6

16 ☐ BY MAIL: I am readily familiar with our business practice for collecting, processing
17 and mailing correspondence and pleadings with the United States Postal Service. Such
18 correspondence and pleadings are deposited with the United States Postal Service on the
same day that they are placed for mailing in the ordinary course of business. I sealed each
envelope and, with postage thereon fully prepaid, placed it for mailing in accord with our
business' practice. (C.C.P § 1013(a) and (b))

19 ☐ BY UNITED PARCEL SERVICE: I caused such envelope(s) to be placed in the UPS
20 Express repository at , California, which provides for next business day delivery on the above
21 addresses by placing a true copy thereof enclosed in a sealed envelope addressed as per
above.

22 ☐ BY PERSONAL SERVICE: I caused such envelope to be delivered on the above
addresses by a process server employed by .

23 ☐ VIA FACSIMILE: I faxed said document, to the office(s) of the addressee(s) shown
24 above, and the transmission was reported as complete and without error.

25 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct. Executed on January 14, 2026 at Pasadena, California.

26 
27 _____
28 Amy S. Ramsey