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9 Attorneys for Plaintiff,
10 DONNA JONES

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

DONNA JONES, on behalf of herself, the State
of California, and other aggrieved employees,

Plaintiff,

vs.

CAVU EXPERIENCES (AMER) LLC; and
DOES 1-100, Inclusive,

Defendants.

Case No. 24CV000624

PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT

[Filed Concurrently with:

1. *Memorandum of Points and Authorities*
2. *Declaration of Baruch Kreiman*
3. *Declaration of Donna Jones*
4. *Declaration of Compliance with Local Rule 2.99.05*
5. *[Proposed] Order*

Date: September 11, 2026
Time: 9:00 AM
Res ID: A-00624-001
Dept: 23
Assigned to: Hon. Jill H. Talley

Complaint Filed: January 16, 2024
Trial Date: None Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on the date and time referenced in the caption above, or as soon thereafter as the matter may be heard in Department 23 of the Superior Court of California, County of Sacramento, located at 720 9th Street, Sacramento, California 95814, Plaintiff Donna

PLAINTIFF'S NOTICE OF MOTION AND MOTION

1 Jones ("Plaintiff") will, and hereby does, move the Court for an order approving the settlement of
2 the Private Attorneys General Act ("PAGA") claims asserted in this action against Defendant
3 CAVU Experiences (AMER) LLC ("Defendant").

4 Plaintiff moves the Court for an order:

- 5 1. Approving the PAGA Settlement Agreement: Finding that the Settlement Agreement
6 entered into between the Parties is fair, reasonable, and adequate, and consistent with
7 the public policy goals of the PAGA;
- 8 2. Approving the Gross Settlement Amount: Approving the Gross Settlement Amount of
9 \$250,000.00 as a non-reversionary sum to resolve all PAGA claims released in the
10 Agreement;
- 11 3. Approving the Allocation of PAGA Penalties: Approving the distribution of the Net
12 Settlement Amount (calculated as the Gross Settlement Amount less approved fees,
13 costs, incentive award, and administration expenses) as civil penalties, allocated 75%
14 to the Labor and Workforce Development Agency ("LWDA") and 25% to the
15 Aggrieved Employees;
- 16 4. Approving Attorneys' Fees and Costs: Approving Class Counsel's request for attorneys'
17 fees in the amount of \$87,500.00 (representing 35% of the Gross Settlement Amount)
18 and reimbursement of actual litigation costs and expenses in an amount up to
19 \$15,000.00;
- 20 5. Approving Settlement Administration Costs: Approving the payment of \$3,500.00 to
21 Phoenix Class Action Administration Solutions for the costs of administering the
22 Settlement; and
- 23 6. Approving the Incentive Award: Approving an Incentive Award of \$10,000.00 to
24 Plaintiff Donna Jones for her efforts in bringing and prosecuting this action on behalf
25 of the State and the Aggrieved Employees.

26 This Motion is based on this Notice, the attached Memorandum of Points and Authorities,
27 the Declaration of Baruch Kreiman, the Declaration of Plaintiff Donna Jones, the Settlement

1 Agreement attached thereto, the pleadings and papers on file in this action, and upon such other
2 evidence and argument as may be presented at the hearing.

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5 DATED: April 6, 2026

By: Baruch Kreiman

Baruch Kreiman, Esq.
Attorney for Plaintiff
Abramson Labor Group