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Attorneys for Plaintiff JEROD GOLDMAN and All
Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

JEROD GOLDMAN, in his representative
capacity, on behalf of the State of California, the
general public, and all aggrieved employees,

Plaintiff,

v.

BILL HOWE PLUMBING INC., a California
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2024-00019731-CU-OE-CTL

*[Assigned for All Purposes to the Honorable
Marcella O. McLaughlin]*

**NOTICE OF UNOPPOSED MOTION FOR
APPROVAL OF PAGA SETTLEMENT AND
REQUEST FOR AWARD OF ATTORNEYS'
FEES, COSTS, ENHANCEMENT AWARD,
AND SETTLEMENT ADMINISTRATION
EXPENSES**

[IMAGED FILE]

Date: September 24, 2026
Time: 9:30 a.m.
Dept: C-72
Judge: Hon. Marcella O. McLaughlin

Complaint Filed: April 26, 2024
Trial Date: None set

*[Memorandum of Points and Authorities; the
Declarations of Vilmarie Cordero and Jerod
Goldman; and [Proposed] Order are filed
concurrently herewith]*

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on September 24, 2026 at 9:30 a.m., in Department C-72 of the San Diego County Superior Court, located at 330 W Broadway, San Diego, CA 92101, Plaintiff Jerod Goldman (“Plaintiff”), will and hereby does, move unopposed for an Order: (1) granting the approval of the proposed settlement of claims brought under the California Labor Code’s Private Attorneys General Act of 2004 (Labor Code § 2698 *et seq.*) (“PAGA”) set forth in the parties’ PAGA Settlement Agreement and Release of PAGA Claims (“Settlement” or “Settlement Agreement”), which is attached as Exhibit 1 to the Declaration of Vilmarie Cordero; (2) directing payment of attorneys’ fees in the amount of \$65,625 and litigation costs in the amount of \$12,720.25 from the Gross Settlement Amount to Plaintiff’s counsel; (2) directing payment of an Enhancement Award to Plaintiff in the amount of \$2,500 from the Gross Settlement Amount; (3) appointing Apex Class Action LLC as the Settlement Administrator and approving payment of its fees not to exceed \$3,740 from the Gross Settlement Amount; (4) directing disbursement of the Net Settlement Amount (the amount remaining of the Gross Settlement Amount following these deductions) pursuant to the terms of the Settlement Agreement; and (5) dismissing this action with prejudice.

Plaintiff’s Motion is made pursuant to California Labor Code section 2699(1)(2) on the grounds that the Settlement was reached as a result of informed arm’s-length negotiations, is fair, reasonable and adequate, and is deserving of approval for the benefit of the State of California, the general public, and the aggrieved employees. In accordance with Labor Code section 2699(1)(2), a copy of the parties’ Settlement Agreement has been submitted to the California Labor and Workforce Development Agency concurrently with the filing of Plaintiff’s Motion.

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1 This Motion is based upon this Notice; the accompanying Memorandum of Points and Authorities;
2 the Settlement Agreement; the declaration of Vilmarie Cordero and any exhibits thereto, the declaration
3 of Jerod Goldman; all pleadings and papers filed in the above-entitled action; and upon any other such
4 evidence and oral argument that may be presented to the Court at the time of the hearing.

5 Respectfully submitted.

6 Dated: September 1, 2026

ARCH LEGAL, P.C.

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8 By: 

9 VILMARIE CORDERO
10 ALLISON E. SCHUBERT
11 Attorneys for Plaintiff
12 Jerod Goldman and All Aggrieved Employees
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