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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CIVIL COMPLEX CENTER**

DAVID A. GREENE, individually and as
representative of the State of California on
behalf of all aggrieved employees,

Plaintiff,

v.

KHALID M. ASIMI and HAMID M. ASIMI,
individuals doing business as Alert Security
Services in Corona, California, and DOES 1 -
20, inclusive,

Defendants.

Case No. 30-2024-01377249-CU-OE-CXC

**NOTICE OF PLAINTIFF'S RENEWED
EX PARTE APPLICATION AND EX
PARTE APPLICATION FOR AN ORDER
SHORTENING THE TIME FOR
HEARING ON PLAINTIFF'S
UNOPPOSED MOTION FOR AN ORDER
(1) APPROVING THE SETTLEMENT OF
PLAINTIFF'S INDIVIDUAL PAGA
CLAIMS AND DISMISSING THOSE
CLAIMS WITH PREJUDICE AND (2)
DISMISSING PLAINTIFF'S PAGA
CLAIMS ON BEHALF OF THE OTHER
AGGRIEVED EMPLOYEES WITHOUT
PREJUDICE; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF PLAINTIFF'S RENEWED
EX PARTE APPLICATION (filed under
separate cover); DECLARATIONS OF
DAVID A. GREENE AND DANIEL V.
SANTIAGO IN SUPPORT OF
PLAINTIFF'S RENEWED EX PARTE
APPLICATION (filed under separate
covers); and [PROPOSED] ORDER
GRANTING PLAINTIFF'S RENEWED
EX PARTE APPLICATION (filed under
separate cover).**

Hearing Date: June 12, 2024
Hearing Time: 1:30 p.m.
Hearing Location: Department CX104
Complaint Filed: February 1, 2024

1 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

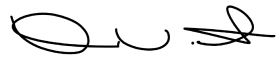
2 **PLEASE TAKE NOTICE** that the Plaintiff, David A. Greene, by and through his
3 undersigned counsel, will appear on June 12, 2024, at 1:30 p.m. in Department CX104 of the
4 Superior Court of California, County of Orange, Civil Complex Center, located at 751 W. Santa
5 Ana Blvd., Santa Ana, California 92701, and move, and hereby moves, without opposition by the
6 Defendants, Khalid M. Asimi and Hamid M. Asimi, for an Order: (a) shortening the time for
7 hearing on Plaintiff's Unopposed Motion for an Order (1) Approving the Settlement of Plaintiff's
8 Individual PAGA Claims and Dismissing Those Claims With Prejudice and (2) Dismissing
9 Plaintiff's PAGA Claims on Behalf of the Other Aggrieved Employees Without Prejudice
10 ("Plaintiff's Unopposed Motion" currently set for hearing on October 3, 2024, at 2:00 p.m. in
11 Department CX104 of the Orange County Superior Court – Reservation Number 74304714) and
12 advancing that hearing to the date and time of this *Ex Parte* Application; and (b) granting the relief
13 requested in Plaintiff's Unopposed Motion.

14 **PLEASE TAKE FURTHER NOTICE** that this renewed *Ex Parte* Application is
15 supported by, *inter alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith
16 under separate cover; (2) the Declaration of the Plaintiff, David A. Greene, filed concurrently
17 herewith under separate cover; (3) the Declaration of Daniel V. Santiago filed concurrently
18 herewith under separate cover; (4) the [Proposed] Order filed concurrently herewith under separate
19 cover; and (5) any additional information provided and/or arguments made at the hearing on this
20 renewed *Ex Parte* Application.

21 Dated: June 10, 2024

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

22 By:



23 Daniel V. Santiago, Esq.

24 Attorney for Plaintiff, David A. Greene
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