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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 UNOPPOSED
MOTION AND 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
UNOPPOSED MOTION (filed under
separate cover); DECLARATION OF
DANIEL V. SANTIAGO IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover); STIPULATION
(filed under separate cover); and
[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover).**

Motion Reservation Number: 74304714

Hearing Date: Thursday, October 3, 2024
Hearing Time: 2:00 p.m.
Hearing Location: Department CX104
Complaint Filed: February 1, 2024

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

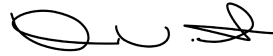
2 PLEASE TAKE NOTICE that the Plaintiff, David A. Greene, by and through his
3 undersigned counsel, will appear on October 3, 2024, at 2:00 p.m. in Department CX104 of the
4 Superior Court of California, County of Orange, Civil Complex Center, located at 751 W. Santa
5 Ana Blvd., Santa Ana, California 92701, and move, and hereby moves, without opposition by the
6 Defendants, Khalid M. Asimi and Hamid M. Asimi, for an Order (1) approving the settlement of
7 Plaintiff's PAGA individual claims against the Defendants and dismissing those claims with
8 prejudice and (2) dismissing Plaintiff's PAGA claims against the Defendants on behalf of the other
9 aggrieved employees without prejudice.

10 PLEASE TAKE FURTHER NOTICE that this Unopposed Motion is supported by, *inter*
11 *alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under separate
12 cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover;
13 (3) the parties' Stipulation filed concurrently herewith under separate cover; (4) the [Proposed]
14 Order filed concurrently herewith under separate cover; and (5) any additional information provided
15 and/or arguments made at the hearing on this Unopposed Motion.

16 Dated: May 28, 2024

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

17 By:



18 Daniel V. Santiago, Esq.

19 Attorney for Plaintiff, David A. Greene
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