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

Hearing Date: June 10, 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 10, 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 *Ex Parte* Application is supported by,
15 *inter alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under
16 separate cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate
17 cover; (3) the [Proposed] Order filed concurrently herewith under separate cover; and (4) any
18 additional information provided and/or arguments made at the hearing on this *Ex Parte* Application.

19 Dated: June 5, 2024

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

20 By:



21 Daniel V. Santiago, Esq.

22 Attorney for Plaintiff, David A. Greene
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