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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 EUGENE LAWSON, MARY CRAWFORD,
13 CHARITY THOMAS, and MISHIEL
HARRISON, individually and on behalf of
the State of California and all Aggrieved
Employees,

14 Plaintiffs,

15
16 v.

17 CAVA GROUP, INC., a Delaware
18 Corporation; CAVA MEZZE GRILL, LLC,
a Maryland Limited Liability Company;
19 CAVA HOLDING COMPANY; ZOE'S
KITCHEN USA, LLC; and DOES 1-100,
20 inclusive,

21 Defendants.

Case No.: 24STCV16024

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF SETTLEMENT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: September 23, 2025

Time: 10:30 a.m.

Dept.: SSC-1

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1 PLEASE TAKE NOTICE that on September 23, 2025, at 10:30 a.m. or as soon thereafter as
2 the matter may be heard, in Department SSC-1 of the above-captioned Court, located at 312 N.
3 Spring Street, Los Angeles, California, Plaintiffs Eugene Lawson, Mary Crawford, Mishiel
4 Harrison, and Charity Thomas (collectively, "Plaintiffs"), on behalf of themselves and the State of
5 California by and through the Labor Workforce & Development Agency, will and hereby do move
6 the Court for an order granting approval of the proposed settlement under the Private Attorneys
7 General Act, Labor Code sections 2698, *et seq.*, approving the payment of civil penalties to the State
8 and the Aggrieved Employees, approving Atticus Administration, LLC as the Settlement
9 Administrator and payment of its fees in the amount of \$12,500.00, and approving payment of
10 Plaintiffs' counsels' attorney's fees in the amount of \$283,333.33 and costs in the amount of
11 \$27,790.50.

12 This motion is brought under Labor Code section 2699(s)(2), and on the grounds that the
13 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
14 and the requested service award and attorney's fees and costs are fair and reasonable under the
15 circumstances of the case.

16 This motion is based upon this Notice of Motion and Motion, the accompanying
17 memorandum of points and authorities, the accompanying declarations of Nikki Trenner, Roman
18 Otkupman, Heather Davis, Robert Ottinger, Eugene Lawson, Mary Crawford, Mishiel Harrison, and
19 Charity Thomas, and Chris Longley, the Parties' PAGA Settlement Agreement filed herewith, the
20 entire Court file in this matter, and on such other argument and evidence as may be presented at or
21 before the hearing in this matter.

22 Dated: August 29, 2025

CROSNER LEGAL, PC

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24 By: 
25 Jamie K. Serb, Esq.
26 Nikki Trenner, Esq.
27 Zachary M. Crosner, Esq.
28 Attorneys for Plaintiff
MARY CRAWFORD

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