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Attorneys for Plaintiff
MONICA STEWART, individually, and as a representative of the State of California and the Labor and Workforce Development Agency, and on behalf of other aggrieved employees,

Electronically FILED by Superior Court of California, County of Los Angeles 11/05/2026 8:02 AM David W. Slayton, Executive Officer/Clerk of Court, By V. Sino-Cruz, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MONICA STEWART, individually and on behalf of the aggrieved employees,

Plaintiff,

v.

MAXIM HEALTHCARE STAFFING SERVICES, INC., a California corporation; **MAXIM HEALTHCARE SERVICES, INC.** a California corporation; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 24STCV09231

[Assigned for all purposes to the Honorable Cherol J. Nellon, Dept. 300]

PLAINTIFF MONICA STEWART'S NOTICE OF MOTION AND UNOPPOSED MOTION TO APPROVE THE PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AGREEMENT PURSUANT TO CALIFORNIA LABOR CODE §§ 2698 *et seq*.

Date: January 19, 2027
Time: 8:30 a.m.
Dept.: 300
CRS Reservation No.: 726882105937

[Filed concurrently with the Memorandum of Points and Authorities in Support of the Motion; Declaration of Danny Yadidsion; Declaration of Monica Stewart; [Proposed] Order; and [Proposed] Judgment]

Complaint Filed: April 12, 2024
First Amended Complaint Filed: June 21, 2024

TO THE COURT, DEFENDANTS, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 19, 2027, at 8:30 a.m. or as soon thereafter as this matter may be heard, in Department 300 of the Superior Court of California, County of Los Angeles, located at 312 North Spring Street, Los Angeles, California 90012, Plaintiff Monica Stewart ("Plaintiff"), individually and in her representative capacity under the Private Attorneys General Act of 2004 ("PAGA") (Labor Code §§ 2698 *et seq*.), will and hereby does move this Court for an order approving the proposed PAGA Settlement Agreement between Plaintiff and Defendant Maxim Healthcare Staffing Services, Inc. (n/k/a Amergis Healthcare Staffing, Inc., and referred to here as "Amergis") which will accomplish the following: 1) approve the representative action settlement embodied in the PAGA Settlement Agreement; 2) approve PAGA Counsel's application for reasonable attorneys' fees and litigation costs; 3) approve the Representative Service Award payment to Plaintiff as PAGA representative on behalf of the State of California and other Aggrieved Employees; and 4) enter judgment approving the proposed PAGA settlement Agreement.

The grounds for this motion, as set forth in the concurrently filed memorandum of points and authorities and supporting declarations, are that this is a fair, reasonable, and adequate settlement of civil penalties brought under the PAGA that benefits the State of California and the aggrieved employees and is the product of serious, informed, and non-collusive negotiations by parties represented by experienced counsel. *See* Lab. Code § 2699(l); *cf. Moniz v. Adecco USA* (2021) 72 Cal.App.5th 56 (overruled in part on other grounds by *Turrieta v. Lyft, Inc*. (2024) 16 Cal.5th 664); *Wershba v. Apple Computer, Inc.* (1996) 91 Cal.App.4th 224, 244–245 (overruled on other grounds by *Hernandez v. Restoration Hardware, Inc.* (2018) 4 Cal.5th 260, 270); *Dunk v. Ford Motor Co.* (1996) 48 Cal.App.4th 1794, 1802; Manual for Complex Litigation (Second) § 30.44.

This Motion is based upon this Notice, the accompanying Memorandum of Points and Authorities, the Declarations of Monica Stewart and Danny Yadidsion, the PAGA Settlement

Agreement, the [Proposed] Order, the [Proposed] Judgment, all pleadings and papers on file in this action, and any other evidence or argument as may be presented at or before the hearing on this Motion.

Defendants do not oppose this Motion or the relief requested herein.

Respectfully Submitted,

DATED: November 5, 2026

LABOR LAW PC

By: Shelley K. Mack
Danny Yadidsion, Esq.
Shelley K. Mack, Esq.
Attorneys for Plaintiff
MONICA STEWART,
individually and on behalf of the aggrieved employees