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Attorneys for Plaintiff,
Jessica Chapdelaine

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

JESSICA CHAPDELAINE, an individual, and
in her representative capacity on behalf of the
State of California, and all other aggrieved
employees,

Plaintiff,

v.

GOLD CLUB – S.F., LLC, a Nevada limited
liability company, S.A.W. ENTERTAINMENT
LIMITED, a California corporation, and DOES
1-25,

Defendants.

Case No: CGC-24-618349

**NOTICE OF MOTION AND MOTION
FOR APPROVAL OF CALIFORNIA
LABOR CODE PRIVATE ATTORNEYS
GENERAL ACT OF 2004 (“PAGA”)
SETTLEMENT**

Complaint Filed: September 23, 2024

*[Concurrently filed with Memorandum of
Points and Authorities in Support of Approval
of PAGA Settlement; Declaration of Harris
Emran, Esq. in Support of Plaintiff’s Motion
for Approval of PAGA Settlement; [Proposed]
Order Granting Plaintiff’s Motion for
Approval of PAGA Settlement; [Proposed]
Judgment Granting Plaintiff’s Motion for
Approval of PAGA Settlement]*

Date: July 18, 2025

Time: 9:00 a.m.

Dept: 301

Hon. Christine Van Aken

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on the date indicated above, at 9:00 a.m., or as soon
thereafter as the matter may be heard, in Department 301 of the above-entitled Court, Plaintiff
Jessica Chapdelaine, will respectfully request the Court’s approval of the proposed and unopposed

1 PAGA Settlement Agreement of Plaintiff's representative claim for civil penalty claims under the
2 Labor Code Private Attorney General Act (i.e., Labor Code section 2698 et seq., "PAGA").

3 The basis for this application is that the parties have reached and fully executed a PAGA
4 Settlement Agreement of the above-entitled case that disposes of the matter entirely, and one aspect
5 of Plaintiff's claims included a demand for relief under PAGA. Pursuant to Labor Code §2699(s)(2),
6 the settlement of PAGA claims requires court approval. Good cause exists for the Court to grant
7 this unopposed Motion as the proposed settlement is fair, adequate, and reasonable and in the best
8 interests of the Aggrieved Employees as a whole. Thus, the parties seek court approval of the PAGA
9 aspect of the settlement so that the matter may be dismissed entirely pursuant to the agreement of
10 the parties.

11 This application is based on this notice, the Declaration of Harris Emran, Esq., and all
12 exhibits attached thereto, the attached Memorandum of Points and Authorities, the PAGA
13 Settlement Agreement, as well as all records on file with this Court and such evidence or oral
14 argument as may be presented at the hearing.

15 As this motion is unopposed, the Parties respectfully relief from the page limit requirement
16 set forth by California Rules of Court, Rule 3.1113(d).

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18 DATED: June 25, 2025

EMRAN LAW

19 By: Harris Emran

20 Harris Emran

21 Attorney for PLAINTIFF
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