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Attorneys for Plaintiff
GREGORY BROWN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

GREGORY BROWN, an individual, and on
behalf of other members of the general public
similarly situated

Plaintiff,

vs.

BIXPY, LLC, a California Limited Liability
Company; HOUMAN NIKMANESH, an
individual; and DOES 1 through 10,
Inclusive,

Defendant(s).

Case No. 24CU009376C

NOTICE OF PLAINTIFF'S UNOPPOSED
MOTION FOR PAGA SETTLEMENT
APPROVAL

Action Filed: September 4, 2024

Hearing Date: September 12, 2025

Hearing Time: 9:00 a.m.

Dept.: C-60

Judge: Hon. Matthew C. Braner

1 TO ALL PARTIES HEREIN AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on September 12, 2025, at 9:00 a.m., or as soon thereafter as
3 the matter may be heard in Department C-60 of the San Diego Superior Court, 330 West Broadway,
4 San Diego, California 92101, the Honorable Matthew C. Braner, presiding, Plaintiff GREGORY
5 BROWN, seeks the Court's Approval of the recent PAGA Settlement.

6 This application is based on this Notice, Memorandum of Points and Authorities in support
7 thereof, the Declaration of Samuel F. Rotshtein (including the attached Settlement Agreement), and
8 the Proposed Order and Judgment.

9 Copies of this Motion and all other papers filed herewith will be served on the following
10 attorneys of record electronically via email concurrent with the filing of this application with the
11 Court:

12
13 **HIGGS FLETCHER & MACK LLP**

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16 San Diego, California 92101-7910

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18 *Attorney for Defendant BIXPY, LLC, and HOUMAN NIKMANESH*

19
20 **GRUENBERG LAW**

21 Dated: August 18, 2025

22 

23 JOSH D. GRUENBERG

24 PAMELA VALLERO

25 SAMUEL ROTSHEIN

26 Attorneys for Plaintiff

27 **GREGORY BROWN**