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10 Attorneys for Plaintiff ANTONIO GARIBAY

11 **SUPERIOR COURT OF CALIFORNIA**

12 **COUNTY OF SAN DIEGO**

13 ANTONIO GARIBAY, an individual, on
14 behalf of himself, other aggrieved
15 employees, and the State of California,

16 Plaintiff,

17 vs.

18 HAKES SASH & DOOR, INC.; and
19 DOES 1 through 50, inclusive,

20 Defendants.

Case No. 24CL012195C

Assigned for All Purposes to:
Hon. Matthew C. Braner, Dept. C-60

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

*[Filed Concurrently with Memorandum, Proposed
Order, Declaration of Daniel J. Hyun, and
Declaration of Antonio Garibay]*

Date: May 1, 2026

Time: 9:00 a.m.

Dept.: C-60

Action Filed: September 19, 2024

Trial Date: None Set

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on May 1, 2026 at 9:00 a.m., or as soon thereafter as the
3 matter may be heard in Department C-60 of the above-entitled Court, located at 330 W. Broadway,
4 San Diego, California 92101, Plaintiff Antonio Garibay (“Plaintiff”) will move, and hereby does
5 move, this Court for an Order approving the Private Attorneys General Act of 2004, California
6 Labor Code (“Labor Code”) sections 2698, *et seq.* (“PAGA”) settlement pursuant to Labor Code
7 Section 2699(s)(2).

8 This Motion is made on the grounds that pursuant to Labor Code Section 2699(s)(2), the
9 Court must review and approve any proposed PAGA settlement. Here, Plaintiff seeks court
10 approval of the proposed PAGA settlement.

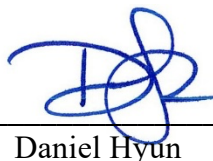
11 In addition, Plaintiff has complied with Labor Code Section 2699(s)(2) by submitting the
12 proposed PAGA settlement to the Labor and Workforce Development Agency (“LWDA”).

13 This Motion is based upon this Notice of Motion and Motion, the Memorandum of Points
14 and Authorities, the Declaration of Daniel J. Hyun, the Declaration of Antonio Garibay, all exhibits
15 attached thereto, and other documents, arguments or evidence as may be presented at the hearing
16 on the Motion.

17
18 Date: April 9, 2026

TORUS LLP

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20 By: _____


Daniel Hyun