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Attorneys for Plaintiffs,
VANESSA MIGUEL and MELISSA MARICICH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF CONTRA COSTA

VANESSA MIGUEL, an individual, and
MELISSA MARICICH, an individual and in a
representative capacity on behalf of the State of
California and other Aggrieved Employees,

Plaintiffs,

vs.

CONGREGATION B'NAI SHALOM OF
CONTRA COSTA COUNTY, a California
nonprofit religious corporation, and DOES 1-15

Defendants.

Case No. C24-02737

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

*[Filed concurrently with Memorandum of
Points and Authorities in Support of
Plaintiff's Motion for Approval of PAGA
Settlement; Declaration of Harris Emran,
Esq; [Proposed] Order Granting Approval of
PAGA Settlement; [Proposed] Judgment
Approving PAGA Settlement]*

Complaint Filed: October 11, 2024

Hearing Date:
Time:
Dept: 39
Hon. Edward Weil

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

2 **PLEASE TAKE NOTICE THAT** on _____, at _____, or as
3 soon thereafter as the matter may be heard, in Department 39 of the above-entitled Court, Plaintiff
4 Melissa Maricich and Plaintiff Vanessa Miguel, will respectfully request the Court's approval of the
5 proposed and unopposed PAGA Settlement Agreement of Plaintiff's representative claim for civil
6 penalty claims under the Labor Code Private Attorney General Act (i.e., Labor Code section 2698
7 et seq., "PAGA").

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

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

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

22
23 Dated: January 2, 2026

EMRAN LAW FIRM P.C.

24
25 By: Harris Emran
26 Harris Emran
27 Attorney for PLAINTIFFS and OTHER
28 AGGRIEVED EMPLOYEES