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Attorneys for Plaintiff,
Ana Arechiga

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF VENTURA

ANA ARECHIGA, an individual, and in her
representative capacity on behalf of the State of
California and other Aggrieved Employees,

Plaintiff,

v.

PARTNERS IN CARE HOME CARE INC., a
California Corporation; ANYSA M SOLIS, an
individual; and DOES 1-15

Defendants.

Case No: 2024CUOE034726

**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: December 18, 2024

Hearing Date: October 28, 2025

Time: 8:30 a.m.

Dept: 20

Hon. Maureen M. Houska

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on the date indicated above, at 8:30 a.m., or as soon
thereafter as the matter may be heard, in Department 20 of the above-entitled Court, Plaintiff Ana
Arechiga, will respectfully request the Court's approval of the proposed and unopposed PAGA

1 Settlement Agreement of Plaintiff's representative claim for civil penalty claims under the Labor
2 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 attached Memorandum of Points and
12 Authorities, the Declaration of Harris Emran, Esq., and all exhibits attached thereto, 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: October 3, 2025

EMRAN LAW FIRM P.C.

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20 By: Harris Emran

Harris Emran

21 Attorney for PLAINTIFF and the Aggrieved
22 Employees
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