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9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 KUPER BANK and CANDACE TURNER,
13 individuals, and on behalf of the State of
14 California, as private attorneys general,

15 Plaintiffs,

16 v.

17 PARADIES SHOPS, LLC, a Limited Liability
18 Company; TASTE, INC., a Corporation; and
DOES 1 through 50, inclusive,

19 Defendants.
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CASE NO.: 24TRCV02360

**NOTICE OF MOTION AND MOTION TO
APPROVE PAGA SETTLEMENT**

Hearing Date: March 4, 2026
Hearing Time: 8:30 a.m.

Judge: Hon. David K. Reinert
Dept: P

Date Filed: July 15, 2024
Trial Date: Not set

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Attorneys for KUPER BANK,
individually, and on behalf of all others
similarly situated and aggrieved

Attorneys for CANDACE TURNER,
individually, and on behalf of all others
similarly situated and aggrieved

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on March 4, 2026, at 8:30 a.m., or as soon thereafter as the
3 matter may be heard, in Department P of the Los Angeles County Superior Court, located at
4 Torrance Courthouse, Plaintiff Kuper Bank and Plaintiff Candace Turner (“Plaintiffs”) will and
5 hereby do move this Court for an order approving the PAGA Settlement Agreement (the
6 “Settlement”) between Plaintiffs and Defendants Paradies Shops, L.L.C., Taste, Inc., Paradies
7 Lagardere @ SMF (F&B), LLC, and Paradies Lagardere @ SMF, LLC (“Defendants”) (Plaintiffs
8 and Defendants are collectively the “Parties”). The Settlement is attached as Exhibit 1 to the
9 Declaration of Taras Kick (“Kick Decl.”), which is submitted herewith under a separate cover.

10 The Settlement is on behalf of Plaintiffs and all individuals who are or previously were
11 employed by Defendants in California and classified as non-exempt employees at any time during
12 the PAGA Period (the “Aggrieved Employees”). The “PAGA Period” means the period from May
13 11, 2023 through December 10, 2024. Plaintiffs allege that Defendants are liable to them and other
14 Aggrieved Employees for Labor Code violations that were alleged in the Operative Complaint and
15 PAGA Notice, or that could have been alleged in the Operative Complaint and PAGA Notice
16 based on the facts alleged therein (“PAGA Released Claims”).

17 Plaintiffs seek division of the \$285,000 Gross PAGA Settlement Amount as follows:
18 \$10,000 Service Payment to Plaintiff Kuper Bank; \$10,000 Service Payment to Plaintiff Candace
19 Turner; \$95,000 PAGA Counsel Fees Payment; \$24,310.42 PAGA Counsel Litigation Expenses
20 Payment; \$6,250 Administrator Expenses Payment; \$139,439.58 PAGA Payment (25% to the
21 Aggrieved Employees – \$34,859.89; 75% to the Labor and Workforce Development Agency
22 (“LWDA”) – \$104,579.69).

23 The Motion is based on this Notice of Motion and Motion, the attached Memorandum of
24 Points and Authorities, the declarations of Taras Kick, Kyle Nordrehaug, Nick Rosenthal, Kuper
25 Bank, and Candace Turner, the PAGA Settlement Agreement, all papers and pleadings on file with
26 the Court in this action, all matters judicially noticeable, and on such oral and documentary
27 evidence as may be presented in connection with the hearing on the motion.

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2 Respectfully Submitted,

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4 DATED: February 4, 2026

THE KICK LAW FIRM, APC

5
6 /s/ Lauren Davis

7 Taras Kick, CA Bar No. 143379
8 Taras@kicklawfirm.com
9 Lauren Davis, CA Bar No. 294115
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11 Tyler J. Dosaj, CA Bar No. 306938
12 Tyler@kicklawfirm.com

13 *Attorneys for Plaintiff Candace Turner, individually,*
14 *and on behalf of all others similarly situated and*
15 *aggrieved*

16 DATED: February 4, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

17 /s/ /s/ Kyle Nordrehaug (w permission)

18 Norman B. Blumenthal (State Bar #068687)
19 Kyle R. Nordrehaug (State Bar #205975)
20 Aparajit Bhowmik (State Bar #248066)
21 Christine T. LeVu (State Bar #288271)
22 Brooke Wilkinson Waldrop (State Bar #314486)
23 Adolfo Sanchez Contreras (State Bar #354371)

24 *Attorneys for Plaintiff Kuper Bank, individually, and*
25 *on behalf of all others similarly situated and*
26 *aggrieved*

27 DATED: February 4, 2026

THE LAW OFFICE OF NICK ROSENTHAL

28 /s/ Nick Rosenthal (w permission)

Nick Rosenthal, CA Bar No. 268297

*Attorney for Plaintiff Candace Turner, individually,
and on behalf of all others similarly situated and
aggrieved*

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