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Attorneys for PLAINTIFF PERSEUS PORRAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

PERSEUS PORRAS, an individual, on behalf
of the state of California, as a private attorneys
general,

Plaintiff,

vs.

TECHNET PARTNERS, INC., a California
corporation; and DOES 1-50, Inclusive;

Defendants

Case No: 23STCV01710

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

Date: October 3, 2024
Time: 10:30AM

Judge: Hon. William F. Highberger
Dept: 10

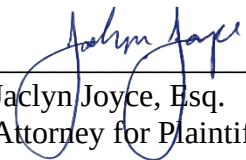
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on October 3, 2024, at 10:30 a.m. or as soon as this
3 matter may be heard in Courtroom 10 of the above-entitled Court before the Honorable Judge William
4 F. Highberger, Plaintiff Perseus Porras ("Plaintiff") will apply for an order approving the California
5 Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor Code
6 §2699(l). The proposed settlement is set forth in the accompanying PAGA Settlement Agreement
7 (the "Settlement Agreement").

8 This motion will be based on this notice of motion and motion, the accompanying points and
9 authorities, the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq.,
10 the Declaration of the Plaintiff, the Declaration of the Settlement Administrator, the Settlement
11 Agreement between the parties, and the complete files and records in this action. All parties have
12 approved the Settlement Agreement and have met and conferred regarding the motion; therefore, this
13 motion is not opposed by Defendant. The Labor Workforce Development Agency has been served
14 with this motion and the Settlement Agreement as set forth in the accompanying Declaration of Jean-
15 Claude Lapuyade. As this Motion is unopposed, the Parties respectfully request relief from the page
16 limit requirement set by California Rules of Court, Rule 3.1113(d).

17 DATED: August 30, 2024

ZAKAY LAW GROUP, APLC

19 By: 
20 Jaclyn Joyce, Esq.
21 Attorney for Plaintiff