

ZAKAY LAW GROUP, APLC

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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

MARIA G. GONZALEZ ROMERO, an
individual, on behalf of herself, and on behalf
of all other aggrieved employees,

Plaintiff,

vs.

CABE BROTHERS RENTALS, LLC, a
California Limited Liability Company; CABE
BROTHERS, a California Corporation; and
Does 1 through 50, Inclusive;

Defendants

Case No: 22STCV18688

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

Date: December 13, 2024
Time: 8:30 a.m.

Judge: Hon. Colin P. Leis
Dept: 74

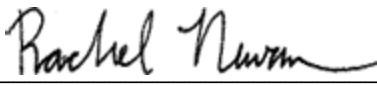
1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on December 13, 2024, at 8:30 a.m. or as soon as
3 this matter may be heard in Courtroom 74 of the above-entitled Court before the Honorable Judge
4 Colin P. Leis, Plaintiff Maria G. Gonzalez Romero ("Plaintiff") will apply for an order approving the
5 California Labor Code Private Attorneys General Act ("PAGA") settlement in accordance with Labor
6 Code §2699(l). The proposed settlement is set forth in the accompanying PAGA Settlement
7 Agreement (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 Defendants. The Labor Workforce Development Agency has been served
14 with copies of this motion and the Settlement Agreement as set forth in the accompanying Declaration
15 of Jean-Claude Lapuyade. As this Motion is unopposed, the Parties respectfully request relief from
16 the page limit requirement set by California Rules of Court, Rule 3.1113(d).

17 DATED: November 18, 2024

ZAKAY LAW GROUP, APLC

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19 By: 
20 Rachel Newman, Esq.
21 Attorney for Plaintiff
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