

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo-Johnson (State Bar #343881)
Monnett De La Torre (State Bar #272884)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
Facsimile: (619) 599-8291
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
mdelatorre@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
Julieann Alvarado (State Bar #334727)
5440 Morehouse Drive, Suite 5400
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203
shani@zakaylaw.com
jackland@zakaylaw.com
julieann@zakaylaw.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

INEZ PARQUETTE, an individual, on behalf
of herself, and on behalf of all other aggrieved
employees,

PLAINTIFFS,

vs.

INLAND VALLEY PARTNERS, LLC; and
Does 1 through 50, Inclusive,

DEFENDANTS.

Case No: 22STCV04406

Action Filed: February 4, 2022

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

Date: November 30, 2022

Time: 8:30 a.m.

Reservation ID: 386297176530

Dept.: 24

Judge: Kristin S. Escalante

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

2 YOU ARE HEREBY NOTIFIED THAT on November 30, 2022 at 8:30 a.m. or as soon as
3 this matter may be heard in Department 24 of the above-entitled Court before the Honorable Judge
4 Kristin S. Escalante, Plaintiff INEZ PARQUETTE (“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(1). The proposed settlement is set forth in the accompanying Joint Stipulation of
7 Settlement of PAGA Action and Release of PAGA Claims (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 Settlement Agreement between the parties, and the complete files and records in this action. All
11 parties have approved the Settlement Agreement and have met and conferred regarding the motion;
12 therefore, this motion is not opposed by Defendant. The Labor Workforce Development Agency has
13 been served with this motion and the Settlement Agreement as set forth in the accompanying
14 Declaration of Shani O. Zakay. As this Motion is unopposed, the Parties respectfully request relief
15 from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

16 DATED: November 2, 2022
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18 **ZAKAY LAW GROUP, APLC**

19 By: 
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21 Shani O. Zakay
22 Attorney for Plaintiff
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