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Attorneys for Plaintiff RICARDO RODRIGUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF VENTURA

RICARDO RODRIGUEZ, an individual, in
his representative capacity on behalf of the
State of California and fellow Aggrieved
Employees,

Plaintiff,

v.

REAL TIME STAFFING SERVICES, LLC.,
a California limited liability company;
EMPLOYBRIDGE, LLC, a California limited
liability company; and DOES 1 through 50,
Inclusive;

Defendants.

Case No.: 56-2021-00559039-CU-OE-VTA

**PLAINTIFF'S NOTICE OF MOTION TO
APPROVE PAGA SETTLEMENT**

Hearing Date: January 22, 2024

Hearing Time: 8:30 a.m.

Judge: Hon. Judge Matthew P. Guasco

Dept.: 20

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 22, 2024, or as soon
3 thereafter as the matter can be heard, in Department 20 of the above-entitled Court, Plaintiff Ricardo
4 Rodriguez (“Plaintiff”), pursuant to labor Code section 2699(1)(2), will apply for an Order
5 Approving the parties’ PAGA Settlement and entry of the agreed-upon Proposed Final Judgment,
6 which are filed concurrently herewith. Defendants have not provided any indication that they
7 oppose Plaintiff’s Motion.

8 This Motion will be made on the grounds that the proposed PAGA Settlement is fair,
9 adequate, reasonable, and in the best interests of the State of California and the aggrieved
10 employees. This Motion will be based on this notice, the accompanying points and authorities, the
11 Declarations of Shani O. Zakay, Esq. and Jean-Claude Lapuyade, Esq. and the complete files and
12 records in this action.

13 Plaintiff respectfully requests that, pursuant to the specific terms (including timing and
14 manner) as set forth in the fully executed PAGA Settlement Agreement (the “Settlement
15 Agreement”) and assuming conditions are met therein, the Court (1) grant approval of the parties’
16 PAGA Settlement; (2) appoint Apex Class Action LLC as the Administrator; and (3) award PAGA
17 Counsel their fees and litigation costs. Plaintiff also requests that the Court sign and enter the
18 proposed PAGA Settlement Approval Order and Final Judgment, filed concurrently herewith.

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20 Dated: December 20, 2023

JCL LAW FIRM, APC

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22 By:

Sydney Castillo-Johnson
Sydney Castillo-Johnson, Esq.

Attorney for Plaintiff and the Aggrieved Employees

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