

JCL LAW FIRM, APC

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Attorneys for PLAINTIFF LUTHER RODDY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

LUTHER RODDY and SAVANNAH L.
BURNETT, individuals, on behalf of the state
of California, as a private attorneys general,

Plaintiffs,

vs.

O'NEILL BEVERAGES CO. LLC, a Delaware
Limited Liability Company; and DOES 1-50,
Inclusive;

Defendants

Case No: CIV2200067

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

Date:

Time:

Judge: Hon. Stephen P. Freccero

Courtroom: A

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

2 YOU ARE HEREBY NOTIFIED THAT on _____, 2024 at _____ a.m./p.m.
3 or as soon as this matter may be heard in Courtroom A of the above-entitled Court before the
4 Honorable Judge Stephen P. Freccero, Plaintiff Savannah L. Burnnett ("Plaintiff") will apply for an
5 order approving the California Labor Code Private Attorneys General Act ("PAGA") settlement in
6 accordance with Labor Code §2699(l). The proposed settlement is set forth in the accompanying
7 PAGA Settlement 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 David Bibiyan, the Declaration of the Plaintiff, the Declaration of the Settlement
11 Administrator, the Settlement Agreement between the parties, and the complete files and records in
12 this action. All parties have approved the Settlement Agreement and have met and conferred
13 regarding the motion; therefore, this motion is not opposed by Defendant. The Labor Workforce
14 Development Agency has been served with this motion and the Settlement Agreement as set forth in
15 the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is unopposed, the Parties
16 respectfully request relief from the page limit requirement set by California Rules of Court, Rule
17 3.1113(d).

18 DATED: May 6, 2024

JCL LAW FIRM, APC

20 By: Sydney Castillo-Johnson
21 Sydney Castillo-Johnson, Esq.
22 Attorney for Plaintiff
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