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Attorneys for Plaintiff JOE MORENO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JOE MORENO, on behalf of himself, other
Aggrieved Employees, and the State of
California,

Plaintiffs,

vs.

EAGLE FOODS, LLC, a California limited
liability company; RAMBO, LLC, a California
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No: 37-2021-00038129-CU-OE-CTL

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: September 19, 2025
Time: 10:30 a.m.

Judge: Hon. Carolyn M. Caietti
Dept: 70

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

2 YOU ARE HEREBY NOTIFIED THAT on September 19, 2025 at 10:30 a.m. or as soon as
3 this matter may be heard in Courtroom A of the above-entitled Court before the Honorable Judge
4 Carolyn M. Caietti, Plaintiff Joe Moreno (“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 Defendants. 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: April 22, 2025

ZAKAY LAW GROUP, APLC

19 By: 
20 Rachel Newman, Esq.

21 Attorney for Plaintiff