

ZAKAY LAW GROUP, APLC

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Attorneys for Plaintiff MELINA WILSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

MELINA WILSON, an individual, on behalf of
herself, on behalf of all persons similarly
situated,

Plaintiffs,

vs.

SPREEN, INC. dba SPREEN HONDA;
HUDSON MOTOR CARS, LLC dba SPREEN
ACURA; JTS MOTOR CARS, LLC dba
SPREEN MAZDA; HUNTER MOTOR CARS,
INC. dba SPREEN HONDA CORONA; and
Does 1 through 50, Inclusive,

Defendants.

Case No: CIVSB2119857

Action Filed: July 9, 2021

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

Date: April 5, 2022

Time: 10:00 a.m.

Dept.: S26

Judge: Hon. David Cohn

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

2 YOU ARE HEREBY NOTIFIED THAT on April 4, 2022 at 10:00 a.m., or as soon thereafter
3 as the matter can be heard, in Department S26 of the above-entitled Court, before the Honorable
4 Judge David Cohn, Plaintiff MELINA WILSON (“Plaintiff”) will apply for an order approving the
5 PAGA settlement in accordance with Labor Code §2699(l). The proposed settlement is set forth in
6 the accompanying Private Attorney General Act (Labor Code Section 2698 *et seq.*) Settlement
7 Agreement and Limited Release (the “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, the Agreement between the parties, and the complete
10 files and records in this action. All parties have approved the Agreement and have met and conferred
11 regarding the motion; therefore, this motion is not opposed by Defendant. The Labor Workforce
12 Development Agency has been served with this motion and the Agreement as set forth in the
13 accompanying Declaration of Shani O. Zakay. As this Motion is unopposed, the Parties respectfully
14 request relief from the page limit requirement set by California Rules of Court, Rule 3.1113(d).

15 DATED: March 11, 2022

17 **ZAKAY LAW GROUP, APLC**

18 By: _____

19 Julieann Alvarado
20 Shani O. Zakay
21 Attorneys for Plaintiff
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