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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ROSANGELA TORRES, an individual, in her
representative capacity on behalf of the State
of California and fellow Aggrieved
Employees,

Plaintiff,

v.

COGSWELL COLLEGE LLC, a California
limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No: 24STCV00409

**NOTICE OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: March 10, 2026

Time: 11:30 a.m.

Judge: William F. Highberger

Dept.: 10

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

2 YOU ARE HEREBY NOTIFIED THAT on DATE, at TIME or as soon as this matter may
3 be heard in Courtroom 10 of the above-entitled Court before the Honorable Judge William F.
4 Highberger, Plaintiff Rosangela Torres (“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 Sydney Castillo-Johnson, Esq., Declaration of Jean-Claude Lapuyade,
10 Esq., the Declaration of Shani O. Zakay, Esq., the Declaration of Plaintiff, the Declaration of the
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 Sydney Castillo-Johnson, Esq. As this Motion is unopposed, the
16 Parties respectfully request relief from the page limit requirement set by California Rules of Court,
17 Rule 3.1113(d).

18 DATED: February 9, 2026

JCL LAW FIRM, APC

20 By: Sydney Castillo-Johnson

21 Sydney Castillo-Johnson, Esq.
22 Attorney for PLAINTIFF