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Attorneys for Plaintiff JUDY LEE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

JUDY LEE, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

WSH MANAGEMENT, INC., a California
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: 24STCV10073

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

Hearing Date: December 10, 2025

Hearing Time: 8:30 a.m.

Opposition Due: November 20, 2025

Reply Due: November 26, 2025

Judge: Hon. Elaine Lu

Dept.: 9

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on December 10, 2025, or as soon
3 thereafter as the matter can be heard, in Department 9 of the above-entitled Court, Plaintiff Judy Lee
4 (hereinafter, "Plaintiff"), will apply for an order approving the California Labor Code Private
5 Attorneys General Act ("PAGA") settlement in accordance with Labor Code §2699(s). The
6 proposed settlement is set forth in the accompanying PAGA Settlement Agreement (the "Settlement
7 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 Kimberly Pollack, the Declaration of the Plaintiff, the Declaration of the
11 Settlement Administrator, the Settlement Agreement between the parties, and the complete files and
12 records in this action. All parties have approved the Settlement Agreement and have met and
13 conferred regarding the motion; therefore, this motion is not opposed by Defendant. The Labor
14 Workforce Development Agency has been served with this motion and the Settlement Agreement
15 as set forth in the accompanying Declaration of Jean-Claude Lapuyade. As this Motion is
16 unopposed, the Parties respectfully request relief from the page limit requirement set by California
17 Rules of Court, Rule 3.1113(d).

18
19 Dated: October 22, 2025

JCL LAW FIRM, APC

By: Perssia Razma

Perssia Razma, Esq.
Attorneys for Plaintiff