

**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)  
Jackland K. Hom (State Bar #327243)  
Julieann Alvarado (State Bar #334727)  
Rachel Newman (State Bar #350826)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619) 255-9047  
Facsimile: (858) 404-9203  
[shani@zakaylaw.com](mailto:shani@zakaylaw.com)  
[jackland@zakaylaw.com](mailto:jackland@zakaylaw.com)  
[julieann@zakaylaw.com](mailto:julieann@zakaylaw.com)  
[rachel@zakaylaw.com](mailto:rachel@zakaylaw.com)

**JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619) 599-8292  
Facsimile: (619) 599-8291  
[jlapuyade@jcl-lawfirm.com](mailto:jlapuyade@jcl-lawfirm.com)

Attorneys for Plaintiff PASHA KRAFT

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SONOMA**

PASHA KRAFT, an individual, on behalf of  
the State of California, as a private attorney  
general,

Plaintiff,

v.

THE LAGUNITAS BREWING COMPANY,  
a California corporation; and DOES 1-50,  
Inclusive,

Defendants.

Case No.: SCV-272762

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

Hearing Date: To Be Set By Court

Hearing Time: To Be Set By Court

Judge: Hon. Patrick Broderick

Dept.: 16

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

2 YOU ARE HEREBY NOTIFIED THAT as soon as the matter can be heard, in Department  
3 16 of the above-entitled Court, Plaintiff PASHA KRAFT (“Plaintiff”), pursuant to Labor Code  
4 section 2699(1)(2), will apply for an Order Approving the Parties’ PAGA Settlement and entry of  
5 the agreed-upon Proposed Final Judgment, which are filed concurrently herewith. Defendant has  
6 advised that it does not oppose Plaintiff’s Motion.

7 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement  
8 is fair, adequate, reasonable, and in the best interests of the State of California and the aggrieved  
9 employees. This Motion will be based on this notice, the accompanying points and authorities, the  
10 Declarations of Shani O. Zakay, Jean-Claude Lapuyade, and Pasha Kraft, and the complete files  
11 and records in this action.

12 Plaintiff respectfully requests that, pursuant to the specific terms (including timing and  
13 manner) as set forth in the executed Joint Stipulation of Settlement of PAGA Action and Release  
14 of PAGA Claims (the “Settlement Agreement”) and assuming conditions are met therein, the Court  
15 (1) grant approval of the parties’ PAGA Settlement; (2) appoint Apex Class Action LLC as the  
16 Claims Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be approved and  
17 sent to the allegedly aggrieved employees with their settlement share checks in the manner set forth  
18 in the Settlement Agreement; and (4) award PAGA Counsel their fees’ and litigation costs. Plaintiff  
19 also requests that the Court sign and enter the proposed PAGA Settlement Approval Order and  
20 Final Judgment, filed concurrently herewith.

21  
22 Dated: May 2, 2024

**JCL LAW FIRM, APC**  
**ZAKAY LAW GROUP, APLC**

23  
24 By:

  
\_\_\_\_\_  
Jean-Claude Lapuyade, Esq.  
Shani O. Zakay, Esq.  
Attorney for Plaintiff and the Aggrieved Employees