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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

PARASTOO MABOUDI, an individual, on
behalf of herself, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

THE NEIMAN MARCUS GROUP LLC, a
Delaware Limited Liability Company; and
DOES 1 through 50, Inclusive;

Defendants.

Case No. 21CV391973

Action Filed: December 15, 2021

**NOTICE OF MOTION AND MOTION
TO APPROVE PLAINTIFFS' PAGA
ACTION SETTLEMENT**

Hearing Date: June 26, 2024

Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner
Department: 19

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 P.M. on June 26, 2024, or as soon thereafter
3 as the matter can be heard, in Department 19 of the above entitled Court, before the Honorable
4 Theodore C. Zayner, Plaintiffs PARASTOO MABOUDI and FRANCESCO MASIELLO
5 (“Plaintiffs”), pursuant to Labor Code section 2699(1)(2) will apply for an Order Approving the
6 Parties’ PAGA settlement and entry of the agreed-upon Proposed Final Judgment, which is filed
7 concurrently herewith. Defendant has advised that it does not oppose Plaintiff’s Motion.

8 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement is
9 fair, adequate, reasonable, and in the best interests of the State of California and the Aggrieved
10 Employees. This Motion will be based on this Notice, the accompanying points and authorities, the
11 Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Shani O. Zakay, Esq., the
12 Declaration of the Settlement Administrator, Sean Hartranft, and the complete files and records in
13 this action.

14 Plaintiffs respectfully request that, pursuant to the specific terms as set forth in the executed
15 PAGA Settlement Agreement (the “Agreement”) and assuming conditions are met therein, the
16 Court (1) grant approval of the Parties’ PAGA Settlement; (2) appoint Apex Class Action, LLC as
17 the Settlement Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be
18 approved and sent to the allegedly Aggrieved Employees with their settlement share checks in the
19 manner set forth in the Agreement; and (4) award PAGA counsel their fees’ and litigation costs.
20 Plaintiffs also request that the Court sign and enter the proposed PAGA Settlement Approval Order
21 and Final Judgment, filed concurrently herewith.

22 DATED: February 13, 2024

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

25 By: 
26 Monnett De La Torre, Esq.
27 Jean-Claude Lapuyade, Esq.
28 Andrea A. Amaya, Esq.
 Shani O. Zakay, Esq.

 Attorneys for Plaintiffs