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Attorneys for Plaintiff JENNY ESTRADA, on behalf
of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

JENNY ESTRADA, an individual, on behalf of
herself, all others similarly situated, and the State
of California,

Plaintiffs,

vs.

ONEMAIN GENERAL SERVICES
CORPORATION, a Delaware corporation;
ONEMAIN FINANCIAL GROUP, LLC, a
Delaware limited liability company; and DOES
1-50,

Defendants.

Case No. 23CV005986

CLASS ACTION Assigned To:

Hon. Lauri Damrell

Dept.: 28

**PLAINTIFF'S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AGREEMENT AND
RELEASE AND FOR AWARD OF
REASONABLE ATTORNEYS' FEES
AND COSTS AND ADMINISTRATION
COSTS**

Hearing Date: December 13, 2024

Time: 9:00 a.m.

Department: 28

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on December 13, 2024, at 9:00 a.m., or as soon thereafter as
3 the matter may be heard in Department 28 of the Superior Court for the County of Sacramento
4 located at 720 9th Street, Sacramento, California, 95814, Plaintiff Jenny Estrada (“Plaintiff” or
5 “PAGA Representative”), on behalf of herself and other similarly aggrieved employees of
6 Defendants OneMain General Services Corporation and OneMain Financial Group, LLC
7 (“Defendants”), will and hereby does move this Court for entry of an Order as follows:

- 8 1. Granting approval, pursuant to California Labor Code § 2698 *et seq.*, and specifically §
9 2699(*I*), of the proposed Settlement of claims brought pursuant to the Private Attorneys
10 General Act of 2004 (Cal. Labor Code § 2698 *et seq.*) and set forth in the Private
11 Attorneys’ General Act Settlement Agreement and Release (“Settlement Agreement”), a
12 copy of which is attached as **Exhibit A** to the Declaration of PAGA Counsel David
13 Yermian (“Yermian Decl.”), filed concurrently herewith;
- 14 2. Appointing APEX Class Action Administration as the Settlement Administrator;
- 15 3. Approving the proposed Settlement Letter provided at **Exhibit A** to the Settlement
16 Agreement as to form and content, and directing the Settlement Administrator to
17 distribute it along with Individual Settlement Payment checks to the PAGA Employees
18 pursuant to the Settlement Agreement terms;
- 19 4. Directing the distribution of the Gross Settlement Amount of \$390,000 pursuant to the
20 terms of the Settlement Agreement and including distribution of the PAGA Settlement
21 Fund to the PAGA Employees and the LWDA; and
- 22 5. Approving an award of attorneys’ fees to PAGA Counsel in the amount of one-third of
23 the Gross Settlement Amount (i.e. \$130,000); an award of attorneys’ costs to PAGA
24 Counsel in the amount of up to \$15,752.32; an award of \$7,000 in administration costs
25 to APEX Class Action Administration; and approving the Individual Settlement
26 Payments to the PAGA Employees and payment to the LWDA from the PAGA
27 Settlement Fund pursuant to the Settlement Agreement.

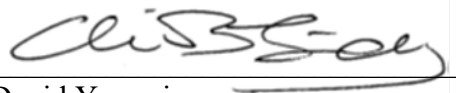
1 Following the filing of this Motion, Plaintiff will submit the proposed Settlement Agreement
2 and the Motion documents to the Labor and Workforce Development Agency (“LWDA”) by
3 uploading them on the LWDA’s website as required by Labor Code § 2699(1)(2). (Declaration of
4 Alvin B. Lindsay (“Lindsay Decl.”), ¶ 17).

5 Defendants do not oppose this motion. Plaintiff bases this Motion on the concurrently filed
6 Memorandum of Points and Authorities, the Declarations of David Yeremian, Alvin B. Lindsay,
7 and Walter Haines, all exhibits attached thereto, the [Proposed] Order and Judgment, the Settlement
8 Agreement, all other pleadings and papers on file in this action and such other further oral and
9 documentary evidence which may be submitted at or before the hearing on this Motion.

10 DATED: November 19, 2024

D.LAW, INC
DAVID YEREMIAN & ASSOCIATES, INC.

11
12
13 By



David Yeremian
Alvin B. Lindsay
Jean H. Power
Attorneys for Plaintiff JENNY ESTRADA
and all others similarly aggrieved