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Attorneys for Plaintiffs BRANDON STOCKER and JOSE OLIVERA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

BRANDON STOCKER and JOSE
OLIVERA, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiff,

v.

SILICON VALLEY SECURITY & PATROL,
INC., a California corporation; and DOES 1
through 50, Inclusive;

Defendants.

Case No.: 22CV015476

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

Hearing Date: March 27, 2024

Hearing Time: 2:30 P.M.

Judge: Hon. Desautels
Dept.: 16

Reservation ID: 810371707876

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:30 p.m. on March 27, 2024, or as soon
3 thereafter as the matter can be heard, in Department 16 of the above-entitled Court, Plaintiffs
4 Brandon Stocker and Jose Olivera ("Plaintiffs"), pursuant to labor Code section 2699(1)(2), will
5 apply for an Order Approving the parties' PAGA Settlement and entry of the agreed-upon Proposed
6 Final Judgment, which are filed concurrently herewith. Defendant has advised that it does not
7 oppose Plaintiffs' Motion.

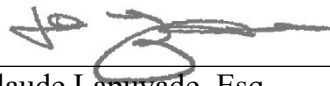
8 This unopposed Motion will be made on the grounds that the proposed PAGA Settlement
9 is fair, adequate, reasonable, and in the best interests of the State of California and the aggrieved
10 employees. This Motion will be based on this notice, the accompanying points and authorities, the
11 Declarations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

13 Plaintiffs respectfully request that, pursuant to the specific terms (including timing and
14 manner) as set forth in the executed Joint Stipulation of Settlement of PAGA Action and Release
15 of PAGA Claims (the "Settlement Agreement") and assuming conditions are met therein, the Court
16 (1) grant approval of the parties' PAGA Settlement; (2) appoint Apex Class Action LLC as the
17 Claims Administrator; (3) direct that the agreed-upon Notice of PAGA Settlement be approved and
18 sent to the allegedly aggrieved employees with their settlement share checks in the manner set forth
19 in the Settlement Agreement; (4) award PAGA Counsel their fees' and litigation costs; and (5)
20 award Plaintiffs their Service Awards. Plaintiffs also request that the Court sign and enter the
21 proposed PAGA Settlement Approval Order and Final Judgment, filed concurrently herewith.

22
23 Dated: March 4, 2024

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24
25 By:



26 Jean-Claude Lapuyade, Esq.

27 Shani O. Zakay, Esq.

28 Attorney for Plaintiff and the Aggrieved Employees



Court Reservation Receipt

Reservation

Reservation ID: 810371707876	Status: RESERVED
Reservation Type: Motion for Order (Motion for Approval of PAGA Settlement)	Number of Motions: 1
Case Number: 22CV015476	Case Title: STOCKER vs SILICON VALLEY SECURITY & PATROL, INC.
Filing Party: Brandon Stocker (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 16
Date/Time: March 27th 2024, 2:30PM	Confirmation Code: CR-ZXHG58TM6B2GYHBPC

Fees

Description	Fee	Qty	Amount
Motion for Order (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX7470	Authorization: 07696G
Payment Date: 2023-11-03	

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