		()) () () () () () () () () (
1	EUGENE RYU, Bar No. 209104	FILED/ENDORSED
2	<u>Gene.Ryu@klgates.com</u> PENNY CHEN, Bar No. 280706	JAN 0 3 2024
3	Penny.Chen@klgates.com ALISON HAMER, Bar No. 258281	By:T. Crowther
4	<u>Alison.Hamer@klgates.com</u> K&L GATES LLP	Deputy Clerk
5	10100 Santa Monica Blvd, 8th Floor Los Angeles, CA 90067	
6	Telephone: 310.552.5000 Fax No.: 310.552.5001	
7	Attorneys for Defendant,	
8	LEGENDS HOSPITALITY, LLC	
9		
10	SUPERIOR COURT	Γ OF CALIFORNIA
11	COUNTY OF S	ACRAMENTO
12		
13	KALI BATES and MICHAEL JOHNSON,	Case No. 34-2022-00317653-CU-OE-GDS
14	individually and on behalf of all others similarly situated,	DEFENDANT LEGENDS
15	Plaintiffs,	HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO PLAINTIFFS'
16	V.	MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND
17	MVP EVENT PRODUCTIONS, LLC, and	PAGA SETTLEMENT
18	LEGENDS HOSPITALITY, LLC; Does 1 through 20, inclusive,	Date: January 19, 2024 Time: 09:00 a.m.
19	Defendants.	Dept.: 27
20		Reservation No.: A-317653-001
21		Trial Date: None Set Complaint Filed: April 1, 2022
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DEFENDANT LEGENDS HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

1	TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:	
2	PLEASE TAKE NOTICE that Defendant LEGENDS HOSPITALITY LLC does not oppose	
3	the following motion for preliminary approval filed by Plaintiffs MICHAEL JOHNSON and KALI	
4	BATES on December 21, 2023:	
5		
6	1) Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and	
7	PAGA Settlement	
8		
9		
10	Dated: January 3, 2024	
11	Aurth	
12	PENNY CHEN ALISON HAMER	
13	K&L GATES LLC	
14	Attorneys for Defendant LEGENDS HOSPITALITY, LLP	
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DEFENDANT LEGENDS HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

1				
1	PROOF OF SERVICE			
2	Case No. 34-2022-00317653-CU-OE-GDS			
3	STATE OF CALIFORNIA, COUNTY OF LOS ANGELES			
4	I am employed in the County of Los Angeles, State of California, over the age of eighteen			
5	years, and not a party of the within action. My business address is 10100 Santa Monica Blvd, Eighth Floor, Los Angeles, CA 90067.			
6	On January 3, 2024, I served the foregoing document(s) described as:			
7	DEFENDANT LEGENDS HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO			
8	PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT			
9	on the interested parties in this as follows:			
10	Tim Del Castillo			
11	Lisa Bradner CASTLE LAW			
12	2999 Douglas Blvd., Suite 180			
	Roseville, CA 95661			
13	tdc@castleemploymentlaw.com			
14	LB@castleemploymentlaw.com			
	<u>RB@castleemploymentlaw.com</u>			
15	<u>TP@castleemploymentlaw.com</u> Telephone: (916) 245-0122			
16	Facsimile: (916) 587-9106			
	Attorneys for Plaintiff Kali Bates			
17	Galen T. Shimoda			
18	Justin P. Rodriguez			
19	Brittany V. Berzin			
19	SHIMODA & RODRIGUEZ LAW, PC			
20	9401 East Stockton Boulevard, Suite			
21	120 Elk Grove, CA 95624			
21	Telephone: (916) 525-0716 Facsimile: (916) 760-3733			
22	attorney@shimodalaw.com			
23	jrodriguez@shimodalaw.com			
24	<u>bberzin@shimodalaw.com</u> Attorneys for Plaintiff Michael Johnson			
	miorneys for Training michael bonnson			
25	(BY ELECTRONIC MAIL) Pursuant to C.R.C. 2.251 or agreement by all parties, I			
26	served the described document(s) by emailing to it each of the aforementioned electronic mail addresses and the transmission was reported as complete and without			
27	error. My email address is <u>amy.portillo@klgates.com</u> .			
28				
	3			
	DEFENDANT LEGENDS HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT			

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1 2 3	(VIA U.S. MAIL) In accordance with the regular mailing collection and processing practices of this office, with which I am readily familiar, by means of which mail is deposited with the United States Postal Service at Los Angeles, California that same day in the ordinary course of business, I deposited such sealed envelope, with postage
4	thereon fully prepaid, for collection and mailing on this same date following ordinary business practices, addressed as set forth above.
5	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
6 7	Executed on January 3, 2024, at Los Angeles, California.
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9	Amy Portillo,
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DEFENDANT LEGENDS HOSPITALITY LLC'S NOTICE OF NON-OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT