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FILED
Superior Court of California
County of Los Angeles

09/24/2021

Sherri R. Carter, Executive Officer / Clerk of Court

By: A. Dastaryan Deputy

Attorneys for Plaintiff EMMA GLASSEL,
on behalf of herself and all other aggrieved employees,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

EMMA GLASSEL, on behalf of herself and
all other aggrieved employees

Plaintiff,

vs.

TOSCANOVA, L.P., a California
Corporation; TOSCANOVA 2 LP, a
California Corporation; KIMBERLYNN
HOLM, an individual, and DOES 1 through
100

Defendants.

Case No. 20VECV00755

*[Assigned for all purposes to Honorable Virginia
Keeny, Dept. W]*

~~PROPOSED~~ FINAL JUDGMENT

*[FILED CONCURRENTLY WITH DECLARATION CATHY
GONZALEZ IN SUPPORT THEREOF; AND REVISED
[PROPOSED] ORDER APPROVING REPRESENTATIVE
PAGA SETTLEMENT]*

Complaint Filed: July 13, 2020
Trial Date: Not Currently Scheduled

The Court has received and considered the joint stipulation of Plaintiff Emma Glassel on her own behalf and on behalf of the people of the State of California, and as an “aggrieved employee” acting as private attorney general under the Labor Code Private Attorneys General Act of 2004, § 2698, et seq. (“PAGA”), and Defendants TOSCANOVA, L.P., a California Corporation and TOSCANOVA 2 LP, a California Corporation (“Defendants”), for approval of the Amended Settlement and Release entered into between Plaintiff on behalf of the State of California as a private attorney general pursuant to PAGA and Defendants, and has entered an Order for Approval of the Representative PAGA Settlement.

1 NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:

2 The Court hereby enters FINAL JUDGMENT in favor of Plaintiff and the Aggrieved
3 Employees in the amount of \$120,000.00 for Plaintiff's claims for PAGA penalties under Labor
4 Code § 2699 for violations of California Labor Code and applicable wages laws, including but
5 not limited to: Labor Code §§ 201, 202, 203, 204, 206, 223, 226, 226.7, 510, 512, 558, 1174(d),
6 1194, 1194.2, 1197, 1197.1, 1198, 1199, 2800, and 2802.

7 The Judgment is awarded and after Defendants have fully funded all settlement payments
8 totaling \$120,000.00, pursuant to the Amended Settlement and Release, it shall be allocated as
9 follows:

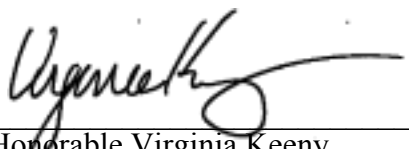
- 10 (a) \$7,500 to Plaintiff Emma Glassel as an incentive award and in exchange for a general
11 release;
12 (b) PAGA Counsel's attorneys' fees in the amount of 33.3% of the Settlement Payment equal
13 to \$39,960.00;
14 (c) PAGA Counsel's costs in the amount of \$7,912.65;
15 (d) Administration costs of no more than \$6,500.00 to be paid to the Settlement Administrator,
16 Simpluris, Inc., with any amount below \$6,500 to be added to the amount paid to the
17 PAGA Members and the LWDA; and
18 (e) the remainder of the Settlement Payment after deducting the items (a), (b), (c) and (d)
19 herein shall be designated as PAGA Penalties, which are estimated to be \$58,127.35, and
20 will be allocated between the LWDA and the Aggrieved Employees pursuant to Labor
21 Code section 2699(i) with 75% paid to the LWDA (\$43,595.51) and 25% paid to the
22 Aggrieved Employees on a pro-rata basis (\$14,531.84).

23 Defendants shall have no further liability for costs, expenses, interests, attorneys' fees, or
24 for any other charge, expense or liability and shall be released from all Covered Claims, all as set
25 forth in the Amended Settlement and Release and Order for Approval of the Representative
26 PAGA Settlement.

27 This "Judgment" is intended to be a final disposition of the above captioned action in its
28 entirety, and is intended to be immediately appealable.

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Dated: 09/24/2021



Honorable Virginia Keeny

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PROOF OF SERVICE

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is HBK Lawyers, 801 N. Brand Blvd., Suite 970, Glendale, California 91203.

On July 27, 2021, I served a copy(ies) of the following document(s): [PROPOSED] FINAL JUDGMENT on the parties to this action by placing them in a sealed envelope(s) addressed as follows:

Attorney	Party(ies) Served	Method of Service
Jesse M. Caryl, Esq. Bent Caryl & Kroll, LLP 6300 Wilshire Boulevard, Suite 1415 Los Angeles, CA 90048 Direct Dial: 323-315-0511 Fax: 323-774-6021 Email: jcaryl@bcklegal.com	Counsel for Defendants	By Case Anywhere

☒ [By Electronic Service] I caused said document to be served to the e-mail addresses listed above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on July 27, 2021, at Glendale, California.

/s/ Melisa Flores

Melisa Flores