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10 Attorneys for Plaintiff JULIETA MORALES,
on behalf of herself and others similarly situated

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12
13 FOR THE COUNTY OF SAN DIEGO

14 JULIETA MORALES, an individual, on behalf
15 of herself and all others similarly situated,

16 Plaintiff,

17 vs.

18 SAN DIEGO SUNRISE MANAGEMENT
COMPANY, a California corporation; TRILAR
19 MANAGEMENT GROUP, a California
corporation; and DOES 1 through 50, inclusive
20

21 Defendants.
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Case No. 37-2020-00015694-CU-OE-CTL

REPRESENTATIVE ACTION

Assigned for All Purposes To:
Hon. Timothy Taylor
Dept.: C-72

[PROPOSED] FINAL JUDGMENT

[filed concurrently with Plaintiff's Notice of Motion and Motion; Memorandum of Points and Authorities; Declaration of David Yeremian; Declaration of Natalie Haritonian; Declaration of Walter Haines; and [Proposed] Order]

1 The Court, having received and considered the Private Attorneys General Act (“PAGA”)
2 Settlement Agreement and Release (“Settlement”) of Plaintiff Julieta Morales (“Plaintiff”) and
3 Defendant San Diego Sunrise Management Company (“Defendant”), approved by this court on
4 _____, 2021, has entered the Order for approval of the Settlement between Plaintiff on
5 behalf of herself and all other similarly situated employees, and Defendant.

6 There are 320 Aggrieved Employees, defined as “all individuals who are or were employed
7 by Defendant as non-exempt employees within the State of California from April 22, 2019 through
8 April 30, 2021.”

9 The Court has finally approved the allocations of funds from the Gross Settlement Amount,
10 and has found the Settlement to be fair, reasonable, and adequate. Defendant and its counsel have
11 approved the form and content of this Judgment, do not object to it, and will not contest its entry.

12 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

13 The Court having entered an Order Granting Approval of PAGA Settlement hereby enters
14 FINAL JUDGMENT in favor of Plaintiff and the Aggrieved Employees in the amount of One Hundred
15 Ninety Thousand Dollars and Zero Cents (\$190,000).

16 Without affecting the finality of this Judgment, the Court shall retain continuing jurisdiction
17 over this action and the Parties, including all Aggrieved Employees and over all matters pertaining to
18 the implementation and enforcement of the terms of the Settlement. Except as provided to the
19 contrary herein, any disputes or controversies arising with respect to interpretation, enforcement or
20 implementation of the Settlement shall be presented by motion to the Court for resolution.

21 This Judgment is intended to be a final disposition of the above-captioned action in its
22 entirety and is intended to be immediately appealable. Subject to the Court’s continuing jurisdiction
23 as set forth above, the Court directs the Clerk of the Court to enter Judgment.

24 **IT IS SO ORDERED.**

25 **DATED:** _____

26
27 **HONORABLE TIMOTHY TAYLOR**
28 **JUDGE OF THE SUPERIOR COURT**