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13 *Attorneys for Plaintiffs and All Aggrieved Employees.*

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES – UNLIMITED JURISDICTION**

16 MARCO CALVILLO, an individual;
17 OCTAVIO RIO CARRANZA, an individual;
18 and
19 All Aggrieved Employees,

20 Plaintiffs,

21 v.

22 UNIX CONSTRUCTION, INC., a California
23 corporation;
24 ARCHIPRO CONSTRUCTION, INC., a
25 California corporation;
26 YOUNG SOOK JUNG, an individual;
27 EUI KYOUNG HWANG, an individual;
28 HO TAE SEOK, an individual; and
DOES 1-20, inclusive,

Defendants

Case No.: 20STCV48935

*[Assigned for all purposes to Hon. Michael P.
Linfield, Dept. 34]*

**[PROPOSED] ORDER FOR APPROVAL
OF REPRESENTATIVE SETTLEMENT OF
PRIVATE ATTORNEYS GENERAL ACT
2004 (“PAGA”) CAUSE OF ACTION**

Date: September 17, 2021
Time: 8:30 a.m.
Dept.: 34

Complaint Filed: December 23, 2020
Trial Date: January 18, 2021

1 The Court, having reviewed the Notice of Motion and Motion for Approval of
2 Representative Settlement of Private Attorneys General Act 2004 ("PAGA") Cause of Action;
3 Memorandum of Points and Authorities in Support, the Declarations of Adrian C. Byrne and Nina
4 Baumler in support thereof, and the exhibits attached thereto, hereby ORDERS:

5 1. The Court finds that the proposed settlement of Plaintiffs' ninth cause of action in the
6 operative First Amended Complaint for civil penalties under PAGA, is fair, reasonable and
7 adequate, and satisfies the standards and applicable requirements for approval of representative
8 PAGA actions under California law.

9 2. Pursuant to Labor Code section 2699(l), the Court approves the penalties to be paid to
10 the State of California and the putative Aggrieved Employees as set forth in the PAGA Settlement
11 Agreement, attached as Exhibit A to the Declaration of Nina Baumler. The Court further approves
12 all payments to be made based on the terms of the PAGA Settlement Agreement.

13 3. The Notice to accompany the PAGA penalty payments to the putative Aggrieved
14 Employees shall be mailed in the form attached as Exhibit B to the Declaration of Nina Baumler.

15 4. Upon entry of this Order, the parties shall effectuate all terms of the settlement based
16 on the provisions and timelines set forth in their PAGA Settlement Agreement.

17 5. The Court hereby sets a final accounting conference on _____.

18 6. Plaintiffs are ordered to submit a declaration from the settlement administrator at least
19 10 days prior to the final accounting conference advising as to the status of administration of the
20 PAGA Settlement, including all information necessary for the Court to determine the total funds
21 successfully disbursed and received by the putative Aggrieved Employees, and any amount(s) to
22 be tendered to the State Controller's Office pursuant to the non-reversionary terms of the PAGA
23 Settlement Agreement.

24 7. This Court shall retain jurisdiction with respect to all matters related to the
25 administration and consummation of the settlement, including but not limited to all matters related
26 to the PAGA Settlement Agreement and the determination of all controversies relating thereto.
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8. Plaintiffs to give notice.

IT IS SO ORDERED.

Dated: _____

By: _____
Hon. Michael P. Linfield