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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO

ALLONA FRAME, SARA
KHESRAWI, and ROXANA EDLYN
GARCIA NUNEZ, on behalf of
themselves and all others similarly
situated, and on behalf of the general
public,

Plaintiffs,

v.

LUXOTTICA OF AMERICA, INC.,
LUXOTTICA RETAIL NORTH
AMERICA, INC.; and DOES 1-100,

Defendants.

Case No. 37-2020-00026895-CU-OE-CTL

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: September 15, 2023
Time: 10:30 a.m.

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1 admission of liability or any wrongdoing by the Released Parties, nor is the Court's Order a
2 finding of the validity of any claims in the lawsuit or of any wrongdoing by the Released Parties.

3 8. This Order is intended to be a final disposition of the lawsuit in its entirety and is
4 intended to be immediately appealable.

5 9. The Court shall retain jurisdiction with respect to all matters related to the
6 administration and consummation of the settlement.

7 **JUDGMENT**

8 10. The Court hereby enters final judgment in this Action in accordance with terms of
9 the Settlement Agreement and the Order Granting Plaintiffs' Motion for Approval of PAGA
10 Settlement. All terms used herein shall have the same meaning as defined in the Settlement
11 Agreement.

12 11. Upon the entry of the Order and Judgment, as defined in the Settlement Agreement,
13 Plaintiffs and all Aggrieved Employees, shall have by operation of the Order Granting Plaintiffs'
14 Motion for Approval of PAGA Settlement and this Judgment, fully, finally and forever released,
15 relinquished, and discharged the Released Parties from the Released Claims as those terms are
16 respectively defined in the Settlement Agreement, and are forever barred and enjoined from
17 prosecuting such released claims against the Released Parties.

18 12. Without affecting the finality of the Order and Judgment, pursuant to California
19 Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of Court, the
20 Court reserves exclusive and continuing jurisdiction over this Action, the Plaintiffs, Aggrieved
21 Employees, and Defendants for the purposes of supervising the implementation, enforcement,
22 construction, and interpretation of the Settlement Agreement, Final Order, and Judgment.

23 Dated: _____

Honorable Richard S. Whitney