

Edwin Aiwanian (SBN 232943)
edwin@calljustice.com
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

HEATHER DAVIS, SBN 239372
heather@protectionlawgroup.com
AMIR NAYEBDADASH, SBN 232204
amir@protectionlawgroup.com
PROTECTION LAW GROUP, LLP
237 California Street
El Segundo, California 90245
Telephone: (424) 290-3095
Facsimile: (866) 264-7880

Attorneys for Plaintiff,
FRANCISCO QUINTANA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO

FRANCISCO QUINTANA, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

vs.

STANFORD PARK HOTEL, LLC, and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 19CIV01194

*Assigned for all purposes to: Hon. Marie S.
Weiner, Dept. 2*

CLASS ACTION

**NOTICE OF ENTRY OF JUDGMENT AND
ORDER**

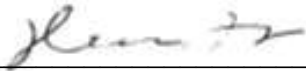
Complaint Filed Date: March 5, 2019
Trial Date: None

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on March 2, 2021, the Honorable Marie S. Weiner, in
3 Department 2 in the above-entitled Court, located at 400 County Center, Redwood City, California
4 94063, executed a Judgment and Order Granting Final Approval of Class Action and PAGA
5 Settlement. Attached hereto as **Exhibit A** is a true and correct copy of the Judgment and Order.

6 DATED: March 4, 2021

PROTECTION LAW GROUP, LLP,

7
8 By: 
9 Heather Davis
10 Amir Nayebdadash
11 Attorneys for Plaintiff
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

FILED
SAN MATEO COUNTY

MAR 03 2021

Electronically
RECEIVED

2/4/2021

Clerk of the Superior Court

By

DEPUTY CLERK

CLERK OF THE SUPERIOR COURT
SAN MATEO COUNTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO

FRANCISCO QUINTANA, individually, and
on behalf of other members of the general
public similarly situated,

Plaintiff,

vs.

STANFORD PARK HOTEL, LLC, an
unknown business entity; and DOES 1 through
100, inclusive,

Defendants.

CASE NO. 19CIV01194

[Assigned for All Purposes to:
The Hon. Marie S. Weiner, Dept. 2]

CLASS ACTION

JUDGMENT and
[PROPOSED] ORDER GRANTING
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT AND ENTRY
OF JUDGMENT.

Action Filed: March 5, 2019
Trial Date: None Set

1 This matter came for hearing upon Plaintiff's unopposed application for approval of the
2 settlement set forth in the Joint Stipulation of Class Action and PAGA Settlement and Release (the
3 "Stipulation"). Due and adequate notice having been given to the Class, and the Court having
4 considered the Stipulation, all papers filed and proceedings had herein and all oral and written
5 comments received regarding the proposed settlement, and having reviewed the record in this
6 Litigation, and good cause appearing,

7 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED AS FOLLOWS:**

8 1. The Court, for purposes of this Order, adopts all defined terms as set forth in the
9 Stipulation filed in this case.

10 2. The Court has jurisdiction over the subject matter of the Litigation, the Class
11 Representative, and the other Members of the Class and Defendant.

12 3. The Court finds that the dissemination of the Notice of Proposed Class Action
13 Settlement as provided for in the Order Granting Preliminary Approval for the Settlement and
14 Setting a Settlement Fairness Hearing, constituted the best notice practicable under the
15 circumstances to all Persons within the definition of the Class, and fully met the requirements of
16 California law and due process under the United States Constitution. Based on evidence and other
17 material submitted in conjunction with the Settlement Fairness Hearing, the actual notice to the
18 class was adequate.

19 4. The Court finds in favor of settlement approval.

20 5. The Court fully and finally approves the settlement of the above-captioned action,
21 as set forth in the Stipulation, each of the releases and other terms, as fair, just, reasonable, and
22 adequate as to the Settling Parties. The Settling Parties are directed to perform in accordance with
23 the terms set forth in the Stipulation.

24 6. No Class Member submitted a valid and timely request for exclusion. Accordingly,
25 all of the Released Claims are hereby released upon the funding of the Gross Settlement Amount
26 by Defendant.

27 7. Except as otherwise provided in the Stipulation, the Settling Parties are to bear their
28 own costs and attorneys' fees.

1 8. Solely for purposes of effectuating this settlement, this Court has certified a class of
2 all Members of the Settlement Class, as those terms are defined in and by the terms of the
3 Stipulation, and this Court has deemed this definition sufficient for purposes of California Rules of
4 Court 3.765(a) and 3.771.

5 9. With respect to the Settlement Class and for purposes of approving the settlement
6 only and for no other purpose, this Court finds and concludes that: (a) the Members of the
7 Settlement Class are ascertainable and so numerous that joinder of all members is impracticable;
8 (b) there are questions of law or fact common to the Settlement Class, and there is a well-defined
9 community of interests among Members of the Settlement Class with respect to the subject matter
10 of the non-exempt claims in the Litigation; (c) the claims of Class Representative are typical of the
11 claims of the Members of the Settlement Class; (d) the Class Representative has fairly and
12 adequately protected the interests of the Members of the Settlement Class; (e) a class action is
13 superior to other available methods for efficient adjudication of this controversy; and (f) the
14 counsel of record for the Class Representative, Edwin Aiwarzian of Lawyers for Justice PC and
15 Heather Davis and Amir Nayebdadash of Protection Law Group LLP are qualified to serve as
16 Class Counsel.

17 10. This Court approves the Individual Settlement amounts, which shall be distributed
18 to Participating Class Members in accordance with the formula set forth in the Stipulation.

19 11. Defendant shall pay a the Gross Settlement Amount of Eight Hundred and Fifty
20 Thousand Dollars (\$850,000.00) and from this amount shall pay (a) attorneys' fees in the amount
21 of Two Hundred and Ninety-Seven Thousand Five Hundred Dollars and Zero Cents (\$297,500.00)
22 and costs of Twenty-Eight Thousand ~~Five Hundred and Eighty Three Dollars and Fifty Nine~~
23 ~~Cents (\$28,583.59)~~ **\$28,000.00** to Class Counsel; (b) a service award in the amount of Seven Thousand Five
24 Hundred Dollars and Zero Cents (\$7,500.00) to Class Representative Francisco Quintana for his
25 unique services; (c) the sum of Fifty Six Thousand Two Hundred Fifty Dollars and Zero Cents
26 (\$56,250.00) to the California Labor and Workforce Development Agency ("LWDA") for PAGA
27 Penalties (which represents the LWDA's seventy-five percent (75%) share of the Seventy-Five
28 Thousand Dollars and Zero Cents (\$75,000.00) in PAGA Penalties paid); and (d) Twelve

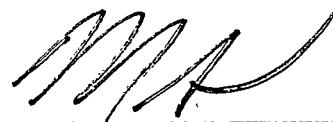
1 Thousand Dollars and Zero Cents (\$12,000.00) to the Settlement Administrator, ILYM Group,
2 Inc., for its fees and costs relating to the claims administration process. This Court finds that these
3 amounts are fair and reasonable. Defendant is directed to make such payments in accordance with
4 the terms of the Stipulation. These amounts, and the Individual Settlement amounts to the Class
5 Members from the remaining Net Settlement Amount shall be paid no later than fourteen (14)
6 calendar days after the Settlement Administrator receives the complete funds from Defendant.

7 12. This Court reserves exclusive and continuing jurisdiction over the Litigation, the
8 Class Representative, the Settlement Class and Defendant for purposes of supervising the
9 implementation, enforcement, construction, administration, and interpretation of the Stipulation
10 and this Judgment.

11 13. Plaintiff shall file and serve formal
12 Notice of Entry of Judgment, including the
13 LWDA

14 IT IS SO ORDERED.

15
16 DATED: 3/2/21



The Honorable Marie S. Weiner
Judge of the Superior Court

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

Quintana v. Stanford Park Hotel, LLC - Case No. 19CIV01194

STATE OF CALIFORNIA, COUNTY OF SAN MATEO

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 237 California Street, El Segundo, California 90245. On March 4, 2021, I served the following documents:

NOTICE OF ENTRY OF JUDGMENT AND ORDER

by placing a true copy thereof enclosed in a sealed envelope and deposited in the mail with postage thereon fully prepaid for USPS First Class Mail and by e-mail on the following individuals pursuant to California Code of Civil Procedure section 1010.6(e)(1):

Jeffrey S. Ranen (Jeffrey.Ranen@lewisbrisbois.com)
Joshua D. Carlon (Joshua.Carlon@lewisbrisbois.com)
LEWIS BRISBOIS BISGAARD & SMITH LLP
633 West 5th Street, Suite 4000
Los Angeles, California 90071

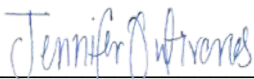
And on the California Labor and Workforce Development Agency via Online Filing:

PAGA Administrator
California Labor & Workforce Development Agency
1515 Clay Street, Suite 801
Oakland, CA 94612
PAGA@dir.ca.gov (Via <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>)

Courtesy Service Copy to:
Hon. Marie S. Weiner and Clerk of the Court
San Mateo Superior Court, Dept. 2
complexcivil@sanmateocourt.org

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 4, 2021, at El Segundo, California.



Jennifer Ontiveros