

Electronically Received 09/12/2022 12:00 AM

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FILED
Superior Court of California
County of Los Angeles
10/24/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: A. Lim Deputy

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
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13 JUAN P. LOPEZ, on behalf of himself and all
14 others similarly situated,

15 **Plaintiff,**

16 **v.**

17 RGGD, INC. dba CRYSTAL ART GALLERY, a
18 California corporation; and DOES 1 through 100,
inclusive,

19 **Defendants.**
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Case No. 20STCV43367

Assigned for all purposes to:
Hon. William F. Highberger, Dept. 10

**[PROPOSED] ORDER GRANTING
MOTION FOR APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AND JUDGMENT THEREON**

PAGA Approval Hearing
Date: October 24, 2022
Time: 2:30 p.m.
Dept: 10

Complaint Filed: November 12, 2020
Trial Date: None Set

**[PROPOSED] ORDER GRANTING MOTION FOR APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT SETTLEMENT**

1 Having considered Plaintiff Juan Lopez's Motion for Approval of Private Attorneys General
2 Act Settlement ("PAGA Approval Motion"), the parties' Private Attorneys General Act Settlement
3 Agreement and Release, the arguments of counsel, and other matters before the Court in this action,
4 and finding good cause,

5 **IT IS HEREBY ORDERED THAT:**

6 **AND JUDGMENT**

7 1. This Order incorporates by reference the definitions of the parties' Private Attorneys
8 General Act Settlement Agreement and Release ("PAGA Settlement Agreement") as though fully
9 set forth herein, and all capitalized terms used herein shall have the same meaning as set forth in the
10 PAGA Settlement Agreement.

11 2. The parties' PAGA Settlement Agreement represents a reasonable and adequate
12 settlement of highly disputed claims, satisfies the purposes of the California Private Attorneys
13 General Act of 2004 to benefit the public, and is hereby approved.

14 3. The allocation of the non-reversionary Gross PAGA Settlement Amount funds of
15 \$315,000.00 among the Aggrieved Employees, the State of California, Plaintiff, Plaintiff's Counsel,
16 and the Settlement Administrator is fair, just, reasonable, adequate, and equitable to all concerned,
17 and is approved to the extent required under Labor Code section 2699(1).

18 4. The Court appoints CPT Group, Inc. as the Settlement Administrator.

19 5. The Court approves as to form and content the Notice of Settlement of PAGA
20 Representative Action ("PAGA Payment Letter"), attached as Exhibit 2 to the Declaration of
21 Jennifer L. Connor in support of the PAGA Approval Motion.

22 6. The Court approves the PAGA Representative Incentive Award of \$6,500.00 to
23 Plaintiff Juan Lopez.

24 7. The Court finds Plaintiff's Counsel's attorneys' fees and cost request to be
25 reasonable under the circumstances, and approves the award of \$110,250 in attorneys' fees and
26 \$11,833.21 in actual litigation costs.

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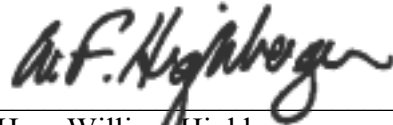
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1 8. The Parties are ordered to carry out the Settlement according to the terms of the
2 PAGA Settlement Agreement.

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4 **IT IS SO ORDERED.**

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6 Dated: 10/24/2022



Hon. William Highberger
Judge of the Superior Court