

FILED
Superior Court of California
County of Los Angeles
02/23/2023

David W. Slayton, Executive Officer / Clerk of Court
By: T. Le Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANNA VALDEZ, an individual, on behalf of
herself, all aggrieved employees, and the State
of California as a Private Attorneys General,

Plaintiff,

vs.

HUY FONG FOODS, INC., a California
Corporation, and DOES 1-50, inclusive,

Defendant.

Case No.: 20STCV43037
Assigned for all purposes to:
Honorable Christopher K. Lui
Dept. 76

~~PROPOSED~~ ORDER GRANTING
APPROVAL OF PAGA SETTLEMENT
AND ENTERING JUDGMENT

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Having received and considered the stipulation, the PAGA Settlement Agreement, and the supporting papers filed, the Court grants approval of the PAGA Settlement Agreement and **HEREBY ORDERS AND MAKES THE FOLLOWING DETERMINATIONS:**

2. The California Labor Workforce and Development Agency (“LWDA”) has been provided notice of the Settlement in accordance with PAGA, California Labor Code § 2699(1)(2), (1)(4). On the date Plaintiff filed the motion seeking approval of the Settlement with the Court, Plaintiff submitted to the LWDA a notice of the Settlement enclosing a copy of the Settlement Agreement. Plaintiff’s notice of the Settlement to the LWDA complied with the notice requirements of PAGA.

4. The Court has jurisdiction over the subject matter of this litigation, over all Aggrieved Employees, and over those persons undertaking affirmative obligations under the Settlement.

6. The PAGA Settlement Notice to Aggrieved Employees fairly and adequately describes the Action, the approved Settlement, and is the best notice practicable under the circumstances.

8. The Gross Settlement Amount and the methodology used to calculate the Individual

1 Penalty Payments in accordance with the Settlement is approved.

2 9. The Court approves CPT Group, to act as the Settlement Administrator. The Court
3 awards the Settlement Administrator in this Action its actual fees and costs in accordance with the
4 terms of the Settlement Agreement, not to exceed \$6,000.00.

5 10. The Court approves the Koul Law Firm and Law Offices of Sahag Majarian II as
6 PAGA Class Counsel.

7 11. The Court awards PAGA Class Counsel attorneys' fees in the amount of \$183,750
8 and actual litigation costs of \$11,684.82 (not to exceed \$20,000.00), both of which the Court finds
9 to be fair and reasonable. The Court authorizes the Settlement Administrator to make these
10 payments, in accordance with the terms of the Settlement Agreement.

11 12. The Court approves Plaintiff's Enhancement Award of \$7,500 for her services in
12 bringing the Action on behalf of the Aggrieved Employees and State of California;

13 13. The Court authorizes the Settlement Administrator to calculate and pay the
14 Individual Penalty Payments in accordance with the terms of the Settlement Agreement.

15 14. The Court authorizes the Settlement Administrator to pay the LWDA Payment in
16 accordance with the terms of the Settlement Agreement.

17 15. Checks for Individual Penalty Payments sent to Aggrieved Employees shall be valid
18 for 180 days after issuance. Funds remaining from any checks for Individual Penalty Payments
19 uncashed after 180 days will be dispersed to the state controller unpaid payment fund in the name
20 of the Aggrieved Employee.

21 16. Upon completion of the Settlement, the Settlement Administrator will provide
written certification of the completion to the Court and counsel for the Parties which shall be filed
21 with the Court within 30 days after completion of the Settlement.

22 17. Without affecting the finality of this order and entry of judgment, the Court retains
23 exclusive and continuing jurisdiction over this Action for purposes of supervising, administering,
24 implementing, and enforcement of this Order and the Settlement.

25 18. Nothing in this Order or the Settlement shall be construed as an admission or
26 concession by any party. The Settlement and this resulting Order and entry of judgement simply

1 represent a compromise of disputed allegations.

2 19. The Court enters final judgment in accordance with the terms of the Settlement
3 Agreement and this Order.

4 20. Plaintiff is directed to submit a copy of this Order and entry of judgment to the
5 LWDA within 10 days of the date of this Order and entry of judgment.

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7 **IT IS SO ORDERED:**

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9 DATED: 02/23/2023



A handwritten signature in black ink, appearing to read "Christopher K. Lui".

Christopher K. Lui / Judge
Judge of the Superior Court

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PROOF OF SERVICE

Case No. 20STCV43037
Valdez v. Huy Fong Foods, Inc.

I, JACKELINE HERNANDEZ declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the entitled case. The name and address of my residence or business is KOUL LAW FIRM, 3435 Wilshire Blvd. Ste. 1710, Los Angeles, California 90010.

On February 14, 2023, I served the foregoing document described as:

[PROPOSED] ORDER GRANTING APPROVAL OF PAGA SETTLEMENT AND ENTERING JUDGMENT

- _____ by placing the document(s) listed above in a sealed envelope, addressed as set forth below, and placing the envelope for collection and mailing in the place designated for such in our offices, following ordinary business practices.
- _____ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00PM.
- X _____ by transmitting via electronic mail the document(s) listed above to the electronic mailing address set forth below on this date before 5:00PM.
- _____ by causing a true copy thereof to be personally delivered to the person(s) at the address(es) set forth below.

on the parties listed below by placing a true copy thereof enclosed in a sealed envelope for collection and mailing in the United States Postal Service following ordinary business practices at Los Angeles, California addressed as follows:

SEE ATTACHED SERVICE LIST

I am readily familiar with the ordinary practice of the business of collecting, processing and depositing correspondence in the United States Postal Service and that the correspondence will be deposited the same day with postage thereon fully prepaid.

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

Executed on this February 14, 2023, in Los Angeles, California.



JACKELINE HERNANDEZ

PROOF OF SERVICE

Case No. 20STCV43037
Valdez v. Huy Fong Foods, Inc.

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