

1 Charles A. Jones, Esq., (SBN: 224915)
2 **JONES LAW FIRM LLC**
3 18124 Wedge Parkway, #511
4 Reno, Nevada 89511
5 Telephone: (775) 853-6440
6 Facsimile: (775) 853-6445
7 Caj@cjoneslawfirm.com

8 Matthew Righetti, Esq., (SBN: 121012)
9 **RIGHETTI GLUGOSKI, P.C.**
10 The Presidio of San Francisco
11 220 Halleck Street, Suite 220
12 San Francisco, CA 94129
13 Telephone: (415) 983-0900
14 Facsimile: (415) 397-9005
15 Matt@righettilaw.com

16 Attorneys for Plaintiff

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **COUNTY OF LOS ANGELES**

19 MARK CHEN, on behalf of himself, the
20 STATE of CALIFORNIA, and all other
21 aggrieved employees, as defined herein,

22 Plaintiff,

23 v.

24 WALMART, INC.,

25 Defendant.

Case No. 20STCV43043

(Assigned for All Purposes to the
Honorable Timothy P. Dillon, Dept. 73)

**[PROPOSED] ORDER APPROVING
SETTLEMENT AND JUDGMENT
THEREON**

Date Action Filed: November 10, 2020
Trial Date: September 12, 2022

1 The motion of plaintiff Mark Chen for an order approving the settlement of the above-
2 captioned action and entering judgment thereon ("Motion") having come before the Court, and the
3 Court being duly apprised of the premises, good cause appearing,

4 IT IS HEREBY ORDERED that the Motion shall be and is granted and the settlement of
5 this action is hereby approved, and

6 IT IS FURTHER ORDERED as follows:

7 1. Capitalized terms in this Approval Order shall have the same meaning they are
8 given in the Settlement Agreement attached as Exhibit 1 to the Declaration of Charles A. Jones
9 filed in support of the Motion;

10 2. Phoenix Settlement Administrators is approved to serve as the Settlement
11 Administrator and is hereby authorized to perform all of the duties assigned to it in the Settlement
12 Agreement and to disburse the following from the Settlement Fund Amount in accordance with
13 the terms of the Settlement Agreement:

- 14 a. The LWDA Payment in the amount of \$2,818,966.01 [Proposed
15 Amount];
- 16 b. The Settlement Payments to PAGA Group Members in the
17 aggregate amount of \$939,655.34 [Proposed Amount];
- 18 c. The Fee and Expense Award in the amount of \$2,049,378.65
19 [Proposed Amount];
- 20 d. The General Release Payment in the amount of \$15,000 [Proposed
21 Amount]; and
- 22 e. The Settlement Administration Costs in the amount of
23 \$77,000 [Proposed Amount].

24 3. The State of California and all PAGA Group Members (including Plaintiff) are
25 hereby deemed to have, and by operation of this Approval Order and Judgment shall have,
26 expressly released, waived, and discharged the Released Parties from the Released Claims, and
27

1 they shall be bound by this Approval Order and Judgment and be forever barred from suing the
2 Released Parties on any of the Released Claims.

3 4. Judgment shall be entered forthwith in accordance with the foregoing, with each
4 side to pay his or its own attorneys' fees and costs except as expressly set forth in the Settlement
5 Agreement.

6 IT IS SO ORDERED, ADJUDGED AND DECREED.

7 Dated: _____, 2022

8

9

10

Honorable Timothy P. Dillon
Judge of the Superior Court

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28