

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Vartan Madoyan (SBN 279015) FIRM NAME: LAWYERS for JUSTICE, PC STREET ADDRESS: 450 North Brand Blvd., Suite 900 CITY: Glendale STATE: CA ZIP CODE: 91203 TELEPHONE NO.: 818.265.1020 FAX NO.: 818.265.1021 EMAIL ADDRESS: ATTORNEY FOR (name): Plaintiff Cynthia Barragan SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 1225 Fallon Street MAILING ADDRESS: CITY AND ZIP CODE: Oakland, 94612 BRANCH NAME: Rene C. Davidson Courthouse	FOR COURT USE ONLY
PLAINTIFF/PETITIONER: Cynthia Barragan DEFENDANT/RESPONDENT: Tiburcio Vasquez Health Center, Inc.	
NOTICE OF ENTRY OF JUDGMENT OR ORDER (Check one): ☒ UNLIMITED CASE ☐ LIMITED CASE (Amount demanded (Amount demanded was exceeded \$35,000) \$35,000 or less)	CASE NUMBER: RG20078693 / Dept. 23

TO ALL PARTIES :

1. A judgment, decree, or order was entered in this action on (date): June 2, 2025

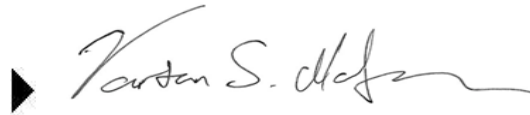
2. A copy of the judgment, decree, or order is attached to this notice.

Exhibit A - Final Approval Order and Judgment

Date: June 5, 2025

Vartan Madoyan

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)



(SIGNATURE)

PLAINTIFF/PETITIONER: Cynthia Barragan
 DEFENDANT/RESPONDENT: Tiburcio Vasquez Health Center, Inc.

CASE NUMBER:
 RG20078693 / Dept. 23

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):

PLEASE SEE ATTACHED PROOF OF SERVICE.

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

- a. ☐ deposited the sealed envelope with the United States Postal Service.
 b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on (*date*):
 b. from (*city and state*):

4. The envelope was addressed and mailed as follows:

- a. Name of person served:

Street address:

City:

State and zip code:

- b. Name of person served:

Street address:

City:

State and zip code:

- c. Name of person served:

Street address:

City:

State and zip code:

- d. Name of person served:

Street address:

City:

State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached:

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

Date: June 5, 2025

Isabel Yang

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

EXHIBIT A

FILEDSuperior Court of California
County of Alameda

06/02/2025

Clad Flake, Executive Officer / Clerk of the Court

By: T. Lopez Deputy
T. Lopez

Arby Aiwazian (SBN 269827)
 Joanna Ghosh (SBN 272479)
 Vartan Madoyan (SBN 279015)
LAWYERS for JUSTICE, PC
 450 North Brand Blvd, Suite 900
 Glendale, California 91203
 Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

CYNTHIA BARRAGAN, individually, and on
 behalf of other members of the general public
 similarly situated, and on behalf of other
 aggrieved employees pursuant to the California
 Private Attorneys General Act;

Plaintiff,

vs.

TIBURCIO VASQUEZ HEALTH CENTER,
 INC., a California corporation; and DOES 1
 through 100, inclusive,

Defendants.

Reservation ID: A-20078693-001

Case No.: RG20078693

Honorable Michael Markman
 Department 23

~~REVISED PROPOSED~~ **FINAL**
APPROVAL ORDER AND JUDGMENT

Complaint Filed: October 20, 2020
 FAC Filed: June 29, 2021
 SAC Filed: September 10, 2021

Trial Date: None Set

1 This matter came before the Honorable Michael Markman, whose courtroom is located
2 in Department 23 of the above-entitled Court, located at Rene C. Davidson Courthouse
3 Administration Building, 1225 Fallon Street, Oakland, CA 94612, on May 29, 2025 at 10:00
4 a.m. for Plaintiff Cynthia Barragan’s (“Plaintiff”) Motion for Final Approval of Class Action
5 and PAGA Settlement, Attorneys’ Fees and Costs, and Class Representative Service Payment
6 (“Motion for Final Approval”).

7 On December 12, 2024, the Court entered an Order Granting Preliminary Approval of
8 Class Action and PAGA Settlement (“Preliminary Approval Order”), thereby preliminarily
9 approving the settlement of the above-entitled (“Action”) in accordance with the Class Action
10 and PAGA Settlement Agreement and Addendum to Class Action and PAGA Settlement
11 Agreement (collectively, the “Settlement Agreement”) entered into by and between Plaintiff and
12 Defendant, which, together with the exhibits annexed thereto set forth the terms and conditions
13 for settlement of the Action (“Settlement”).

14 Having reviewed the Settlement Agreement and duly considered the parties’ papers and
15 oral argument, and good cause appearing,

16 **THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS:**

17 1. This Order incorporates by reference the definitions in the Settlement Agreement
18 and the Preliminary Approval Order, and all capitalized terms used, but not defined, herein,
19 shall have the same meanings as in the Settlement Agreement.

20 2. This Court has jurisdiction over the claims of the Class Members asserted in this
21 proceeding and over all parties to the Action.

22 3. The Court finds that the applicable requirements of California Code of Civil
23 Procedure section 382 and California Rule of Court 3.769, *et seq.* have been satisfied with
24 respect to the Class and the Settlement. The Court hereby makes final its earlier provisional
25 certification of the Class for settlement purposes, as set forth in the Preliminary Approval Order.
26 The Class is hereby defined to include: all current and former hourly-paid or non-
27 exempt employees employed by Defendant in California at any time during the Class Period (as
28 it is defined in the Settlement Agreement).

1 4. The Court confirms Lawyers for Justice, PC as counsel for the Class (“Class
2 Counsel”), and Plaintiff Cynthia Barragan as representative of the Class (“Class
3 Representative”).

4 5. The Notice of Class Action Settlement (“Class Notice”) that was provided to the
5 Class Members, fully and accurately informed the Class Members of all material elements of
6 the Class Action Settlement and of their opportunity to participate in, object to or comment
7 thereon, or to seek exclusion from, the Class Action Settlement; was the best notice practicable
8 under the circumstances; was valid, due, and sufficient notice to all Class Members; and
9 complied fully with the laws of the State of California, the United States Constitution, due
10 process and other applicable law. The Class Notice fairly and adequately described the Class
11 Action Settlement and provided Class Members with adequate instructions and a variety of
12 means to obtain additional information.

13 6. Pursuant to California law, the Court hereby grants final approval to the
14 Settlement and finds that it is reasonable and adequate, and in the best interests of the Class as a
15 whole. More specifically, the Court finds that the Settlement was reached following meaningful
16 discovery and investigation conducted by Class Counsel; that the Settlement is the result of
17 serious, informed, adversarial, and arms-length negotiations between the parties; and that the
18 terms of the Settlement are in all respects fair, adequate, and reasonable. In so finding, the Court
19 has considered all of the evidence presented, including evidence regarding the strength of
20 Plaintiff’s claims; the risk, expense, and complexity of the claims presented; the likely duration
21 of further litigation; the amount offered in the Settlement; the extent of investigation and
22 discovery completed; and the experience and views of Class Counsel. The Court has further
23 considered the absence of any objections to the Class Action Settlement submitted by Class
24 Members. Accordingly, the Court hereby directs that the Settlement be affected in accordance
25 with the Settlement Agreement and the following terms and conditions.

26 7. A full opportunity has been afforded to Class Members to participate in the Final
27 Approval Hearing, and all Class Members and other persons wishing to be heard have been
28 heard. The Court also finds that Class Members also have had a full and fair opportunity to

1 exclude themselves from the Class Action Settlement. Accordingly, the Court determines that
2 all Class Members who did not submit a timely and valid Request for Exclusion to the
3 Settlement Administrator (“Participating Class Member”) are bound by the Class Action
4 Settlement and by this order and judgment (“Final Approval Order and Judgment”).

5 8. The Court finds that payment of Settlement Administration Costs in the amount
6 of \$10,000.00 is appropriate for the services performed and costs incurred and to be incurred for
7 the notice and settlement administration process. It is hereby ordered that the Settlement
8 Administrator, Simpluris, Inc., shall issue payment to itself in the amount of \$10,000.00, in
9 accordance with the terms and methodology set forth in the Settlement Agreement.

10 9. The Court finds that the Class Representative Service Payment, in the amount of
11 \$8,750.00, to Plaintiff, is fair and reasonable for the work performed by Plaintiff on behalf of
12 the Class, and the State of California. It is hereby ordered that the Settlement Administrator
13 issue payment in the amount of \$8,750.00, to Plaintiff for her Class Representative Service
14 Payment, according to the terms set forth in the Settlement Agreement.

15 10. The Court finds that the allocation of \$200,000.00 toward penalties under the
16 Private Attorneys General Act, California Labor Code section 2698, *et seq.* (“PAGA Payment”),
17 is fair, reasonable, and appropriate, and hereby approved. The Settlement Administrator shall
18 distribute the PAGA Payment as follows: 75%, or the amount of \$150,000.00, will be paid to
19 the California Labor and Workforce Development Agency, and 25%, or the amount of
20 \$50,000.00, will be distributed to the Aggrieved Employees on a *pro rata* basis, based on their
21 Qualifying Pay Periods during the PAGA Period.

22 11. The Court finds that attorneys’ fees in the amount of up to \$496,000.00 to Class
23 Counsel are fair, reasonable, and appropriate, and are hereby approved. It is hereby ordered that
24 the Settlement Administrator issue payment in the amount of \$496,000.00 to Class Counsel for
25 attorneys’ fees, in accordance with the terms and methodology set forth in the Settlement
26 Agreement. However, ten percent (10%) of the attorneys’ fees must be kept in the Settlement
27 Administrator’s trust fund until the completion of the distribution process and court approval of
28 a final accounting.

1 12. The Court finds that reimbursement of litigation costs and expenses in the
2 amount of \$16,632.73 to Class Counsel is reasonable, and hereby approved. It is hereby
3 ordered that the Settlement Administrator issue payment in the amount of \$16,632.73 to Class
4 Counsel for reimbursement of litigations costs and expenses, in accordance with the terms and
5 methodology set forth in the Settlement Agreement.

6 13. The Court finds that the Net Settlement Amount of \$818,617.27 to be fully
7 distributed to the Class Members who did not timely opt out of the Settlement is reasonable, and
8 hereby approved. It is hereby ordered that the Settlement Administrator will issue payments in
9 the total amount of \$818,617.27 to Participating Class Members, in accordance with the terms
10 and methodology set forth in the Settlement Agreement.

11 14. The Court hereby enters Judgment by which, upon Effective Date and payment
12 by Defendant to the Settlement Administrator of the full amount of the Gross Settlement
13 Amount (i.e., \$1,550,000.00) and Employer Taxes, Plaintiff and Participating Class Members
14 will be deemed to have fully, finally, and forever released, settled, compromised, relinquished,
15 and discharged the Released Parties and Released Claims as set forth in the Settlement
16 Agreement and Class Notice.

17 15. It is hereby ordered that Defendant fund (to the extent not already funded) the
18 Gross Settlement Amount plus an amount sufficient to pay Employer Taxes pursuant to the
19 Settlement Agreement to the Settlement Administrator in two installments. The First Installment
20 Payment of \$775,000.00 must be transmitted into an escrow account to be established by the
21 Settlement Administrator (the "Escrow Account") within 30 calendar days following the
22 Effective Date. The Second Installment payment must be transmitted to the Escrow Account
23 within 90 days after the date of Defendant's First Installment Payment.

24 16. It is hereby ordered that the Settlement Administrator shall distribute Individual
25 Class Payment to Participating Class Members, Individual PAGA Payments to Aggrieved
26 Employees, the Class Representative Service Payment to Plaintiff, the LWDA Payment to the
27 LWDA, the Attorneys' Fees and Costs to Class Counsel, and the Settlement Administration
28

Costs to the Settlement Administrator within 14 calendar days after Defendant transmits the Second Installment Payment.

17. It is hereby ordered that any and all Individual Class Payment checks issued to Participating Class Members that are not cashed, deposited, or otherwise negotiated within 180 calendar days from the date of their mailing will be cancelled and the funds associated with such cancelled checks will be distributed in accordance with Code of Civil Procedure Section 384 to Centro Legal De La Raza. However, all such unclaimed funds should not be distributed to Centro Legal De La Raza until the Court approves the final accounting.

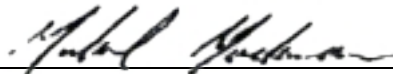
18. After entry of this Final Approval Order and Judgment, pursuant to California Rules of Court, Rule 3.769(h), the Court shall retain jurisdiction to construe, interpret, implement, and enforce the Settlement Agreement and this Final Approval Order and Judgment, to hear and resolve any contested challenge to a claim for settlement benefits, and to supervise and adjudicate any dispute arising from or in connection with the distribution of settlement benefits.

19. Notice of entry of this Final Approval Order and Judgment shall be given by posting a copy of the Final Approval Order and Judgment on the Settlement Administrator's website for a period of at least 60 calendar days after the date of entry of this Final Approval Order and Judgment. Individualized notice is not required to the Class.

20. A Final Compliance Hearing is scheduled for March 12, 2026 at 10:00 a.m. No later than 7 court days before the Final Compliance Hearing, Plaintiff must file a final report and declaration regarding distribution. If the report and declaration establish that the distributions are complete, appearance may not be required.

IT IS SO ORDERED.

DATE: 06/02/2025


The Honorable Michael Markman
Judge of the Alameda County Superior Court
of California **Michael Markman / Judge**

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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 450 North Brand Blvd., Suite 900, Glendale, California 91203.

On June 5, 2025, I served the foregoing document(s) described as: **NOTICE OF ENTRY OF JUDGMENT OR ORDER** on interested parties in this action by Electronic Service as follows:

Jahmal T. Davis (jdavis@hansonbridgett.com)
Josue R. Aparicio (japaricio@hansonbridgett.com)
HANSON BRIDGETT LLP
425 Market Street, 26th Floor
San Francisco, CA 94105

Attorneys for Defendant Tiburcio Vasquez Health Center, Inc.

[X] BY E-MAIL

The above-referenced document(s) was transmitted to the person(s) at the e-mail address(es) listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

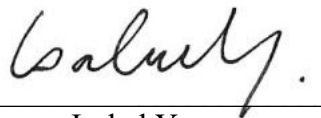
[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] STATE

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

Executed on June 5, 2025, at Glendale, California.



Isabel Yang