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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10 **POMONA COURTHOUSE SOUTH**

11 GINA T. DELGADO, individually and as
12 representative of the State of California on
13 behalf of herself and all aggrieved employees,

14 Plaintiff,

15 v.

16 NG-27 PATAN, INC., a California corporation,
17 GOVIND BHAI PRAJAPATI, an individual,
18 and DOES 1 through 20, inclusive,

19 Defendants.

Case No. 20PSCV00572

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S EX PARTE
APPLICATION FOR AN ORDER (1)
APPROVING THE SETTLEMENT OF
PLAINTIFF'S INDIVIDUAL PAGA
CLAIMS AGAINST THE DEFENDANTS
AND (2) DISMISSING THOSE PAGA
CLAIMS WITH PREJUDICE**

Judge: Honorable Gloria White-Brown
Department: J
Complaint Filed: August 28, 2020

20 **[Filed Concurrently With (a) Notice of Plaintiff's Ex Parte Application and Plaintiff's Ex**
21 **Parte Application For an Order: (1) Approving the Settlement of Plaintiff's Individual PAGA**
22 **Claims Against the Defendants; and (2) Dismissing Those PAGA Claims With Prejudice, (b)**
23 **Memorandum of Points and Authorities in Support of Plaintiff's Ex Parte Declaration, and**
24 **(c) Declaration of Daniel V. Santiago in Support of Plaintiff's Ex Parte Application]**

25 This representative action under the Private Attorneys' General Act of 2004 ("PAGA"),
26 California Labor Code §2698 et seq., was filed on August 28, 2020, by the Plaintiff, Gina T.
27 Delgado, as representative of the State of California on behalf of herself and all aggrieved
28 employees, against the Defendants, NG-27 Patan, Inc. and Govind Bhai Prajapati. As used herein,
the term "aggrieved employees" is defined as all California residents employed by Defendant NG-

1 27 Patan, Inc. at any time within one year preceding the filing of Plaintiff's Complaint in this action
2 up to and through the time of trial for this action. Plaintiff has filed an Ex Parte Application for an
3 Order: (1) approving the settlement of Plaintiff's individual PAGA claims against the Defendants;
4 and (2) dismissing those PAGA claims with prejudice ("Plaintiff's Ex Parte Application").

5 **ORDER**

6 Having considered Plaintiff's Ex Parte Application and related papers filed by Plaintiff's
7 counsel (Notice of Plaintiff's Ex Parte Application, Memorandum of Points and Authorities in
8 support of Plaintiff's Ex Parte Application, and Declaration of Daniel V. Santiago in support of
9 Plaintiff's Ex Parte Application), and good cause appearing for the relief requested therein,

10 **IT IS HEREBY ORDERED THAT:**

11 1. The Court approves of the settlement of Plaintiff Gina T. Delgado's individual
12 PAGA claims against the Defendants, NG-27 Patan, Inc. and Govind Bhai Prajapati, for One
13 Thousand Two Hundred Fifty Dollars (1,250) to be paid as follows:

14 (a) Seventy Hundred Fifty Dollars (\$750) to the Labor and Workforce Development
15 Agency ("LWDA");

16 (b) Two Hundred Fifty Dollars (\$250) to the Plaintiff; and

17 (c) Two Hundred Fifty Dollars (\$250) to the Law Offices of Daniel V. Santiago, P.C.
18 which reflects payment of a portion of the attorney's fees and costs incurred by Plaintiff's counsel
19 in the prosecution of Plaintiffs' individual PAGA claims against Defendants at issue in this action.

20 2. The aforementioned settlement payments to the LWDA, Plaintiff and Plaintiff's
21 counsel shall be funded by Defendants via transfer of those settlement funds to the Law Offices of
22 Daniel V. Santiago, P.C.'s Client Trust Account in accordance with the terms of the parties'
23 agreement.

24 3. Plaintiff's individual PAGA claims against the Defendants are hereby dismissed with
25 prejudice.

26 4. Plaintiff's PAGA claims against the Defendants on behalf of the other aggrieved
27 employees are hereby dismissed without prejudice.

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Dated: _____

The Honorable Judge Gloria White-Brown
Judge of the Los Angeles Superior Court