

KINGSLEY & KINGSLEY, APC
ERIC B. KINGSLEY, Esq. (SBN 185123)
eric@kingsleykingsley.com
KELSEY M. SZAMET, Esq. (SBN 260264)
kelsey@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Telephone: (818) 990-8300
Fax: (818) 990-2903

Attorneys for Plaintiff and the Proposed Class

O'HAGAN MEYER
CLINT D. ROBISON, Esq. (SBN 158834)
crobison@ohaganmeyer.com
SAMANTHA L. SQUILLANTE, Esq. (SBN 318582)
ssquillante@ohaganmeyer.com
21550 Oxnard Street, Suite
1050 Woodland Hills, CA,
91367
Tel: (213) 306-1610, Fax: (213) 306-1615

Attorneys for Defendant
Air Culinaire Worldwide, LLC

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

HELEN SANTOS, an individual, on behalf of
herself and others similarly situated,

PLAINTIFF,

v.

AIR CULINAIRE WORLDWIDE, LLC; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 20STCV40648

[Case Assigned for All Purposes to Hon.
William F. Highberger in Dept. 10]

**[PROPOSED] ORDER APPROVING
AMENDED CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

*[Filed concurrently with Declaration of Kelsey
M. Szamet Re: Amended Joint Stipulation of
Class Action Settlement]*

1 The Motion for Preliminary Approval of the Joint Stipulation of Class Action Settlement
2 and Release of Claims (“Settlement Agreement”) came before this Court on June 7, 2022. The
3 Court, having considered the papers submitted in support of Plaintiff’s Motion for Preliminary
4 Approval granted preliminary approval of the Joint Stipulation of Class Action Settlement
5 and Release of Claims on June 13, 2022.

6 On or about November ____, 2022, the Parties submitted an Amended Joint Stipulation
7 of Class Action Settlement and Release of Claims to specify the definition of “PAGA Class
8 Member” and the dates of the “PAGA Covered Period.” The Court has been provided with a
9 copy of the Amended Joint Stipulation of Class Action Settlement and Release of Claims.

10 **THE COURT HEREBY ORDERS THE FOLLOWING:**

11 The Court approves the Parties request to amend the preliminarily-approved Settlement
12 Agreement based upon the terms set forth in the Amended Joint Stipulation of Class Action
13 Settlement and Release of Claims attached hereto as Exhibit “A”.

14
15
16 **DATED:** _____

JUDGE OF THE SUPERIOR COURT

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

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 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On December 15, 2022, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER APPROVING AMENDED CLASS ACTION AND PAGA SETTLEMENT AGREEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Clint D. Robison
Samantha L. Squillante
crobison@ohaganmeyer.com
ssquillante@ohaganmeyer.com
O'Hagan Meyer
21550 Oxnard Street, Suite 1050
Woodland Hills, CA, 91367

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL THROUGH CASE ANYWHERE: On interested parties set forth on the attached service list.

[XX] (STATE): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 15, 2022, at Sherman Oaks, California.



Leslie Sanchez