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Attorneys for Plaintiff,
SHOHREH FIROUZTALE

FILED
Superior Court of California
County of Los Angeles
01/11/2023

David W. Slayton, Executive Officer / Clerk of Court
By: A. Robledo Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

SHOHREH FIROUZTALE, individually, and
on behalf of aggrieved employees pursuant to
the Private Attorneys General Act (“PAGA”);

Plaintiff,

v.

TEMPLE ISRAEL OF HOLLYWOOD, a
California Corporation; HILLSIDE
MEMORIAL PARK AND MORTUARY, a
business entity form unknown; THE BAY-
NIMOY EARLY CHILDHOOD CENTER, a
business entity form unknown; and DOES 1
through 50, Inclusive,

Defendants.

Case No.: 21STCV02021
[Judge Rupert A. Byrdsong, Dept. 28]

[PROPOSED] JUDGMENT

Date Complaint Filed: January 19, 2021

1 **[PROPOSED] JUDGMENT**

2 The Court, having reviewed the Joint Stipulation Requesting Approval of Private Attorney
3 General Act Settlement (the “Stipulation”) and the parties’ fully signed Settlement Agreement
4 attached as Exhibit “A” to the Stipulation, and good cause appearing therefore, the Court hereby
5 orders entry of judgment in this action as follows:

6 1. The Court approves the parties’ settlement of this action pursuant to Labor Code
7 Section 2699(1)(2) as fair and reasonable in light of the facts and circumstances specific to this
8 case;

9 2. Defendants Temple Israel of Hollywood and Hillside Memorial Park and Mortuary
10 shall pay nothing, and The Bay-Nimoy Early Childhood Center shall pay the gross settlement sum
11 of \$37,500.00 (“Gross Settlement Sum”) allocated as set forth in this Judgment;

12 3. From the Gross Settlement Sum, the Court awards Plaintiff’s counsel Boris Dalis
13 attorney’s fees in the sum of \$ 12,375.00 ;

14 4. From the Gross Settlement Sum, the Court awards Plaintiff’s counsel Boris Dalis
15 costs in the sum of \$ 1,160.00 ;

16 5. From the Gross Settlement Sum, the Court grants Plaintiff an enhancement award in
17 the sum of \$ 2,000.00 in acknowledgment of her service as the named representative aggrieved
18 employee in this action;

19 6. From the Gross Settlement Sum, Defendant The Bay-Nimoy Early Childhood
20 Center shall pay Plaintiff the sum of \$ 18,000.00 in compromise and release of Plaintiff’s
21 individual claims (not the PAGA claim);

22 7. For purposes of this Judgment, the “Net Settlement Amount” means the Gross
23 Settlement Sum less the sums set forth in sections 3 through 6, above. Defendants Temple Israel of
24 Hollywood, Hillside Memorial Park and Mortuary, and The Bay-Nimoy Early Childhood Center
25 shall pay seventy five percent (75%) of the Net Settlement Amount to the State of California Labor
26 and Workforce Development Agency (the “LWDA Penalty Payment”) and the remaining twenty-
27 five percent (25%) to the PAGA Members (the “PAGA Representative Group Penalty Payment”)
28 as provided in the parties’ Settlement Agreement, which is incorporated by this reference;

[PROPOSED] JUDGMENT

1 8. In compliance with Labor Code section 2699(1)(3), Plaintiff's counsel shall file a
2 copy of this Judgment with the Labor and Workforce Development Agency within 10 days of entry
3 of this Judgment;

4 9. Plaintiff's counsel shall give notice of entry of this Judgment;

5 10. Pursuant to Code of Civil Procedure section 664.6, this Court shall retain
6 jurisdiction with respect to all matters related to the administration and consummation of the
7 Settlement Agreement, and any and all claims asserted in, arising out of, or related to the subject
8 matter of the lawsuit, including but not limited to all matters related to the Settlement Agreement
9 and the determination of all controversies relating thereto; and

10 11. This action is hereby dismissed with prejudice.

11 **IT IS SO ORDERED.**



Rupert A. Byrdsong

Rupert A. Byrdsong / Judge

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14 Dated: 01/11/2023

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Hon. Rupert A. Byrdsong