

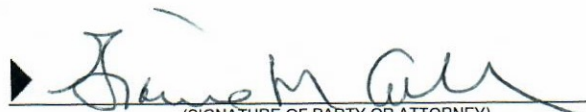
ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 318962 NAME: Grainne Callan FIRM NAME: Grainne Callan, Esq. STREET ADDRESS: 1030 E. El Camino Real #374 CITY: Sunnyvale STATE: CA ZIP CODE: 94087 TELEPHONE NO.: 408-982-6224 FAX NO.: E-MAIL ADDRESS: Grainne.Callan@callanlawoffice.com ATTORNEY FOR (name): Plaintiff Todd Truesdell		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles 01/19/2023 David W. Slayton, Executive Officer / Clerk of Court By: <u>K. Neal</u> Deputy
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 1725 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Santa Monica 90401 BRANCH NAME: Santa Monica Courthouse		
PLAINTIFF/PETITIONER: Todd Truesdell DEFENDANT/RESPONDENT: Fusiform, Inc.; Alex Matthews; Warren Mile Turner OTHER:		CASE NUMBER: 21SMCV00463
PROPOSED ORDER (COVER SHEET)		JUDICIAL OFFICER: Hon. Mark Epstein DEPT: R

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

- Name of the party submitting the proposed order:
Plaintiff Todd Truesdell
- Title of the proposed order:
[PROPOSED] ORDER GRANTING MOTION FOR APPROVAL OF PAGA SETTLEMENT AND JUDGMENT
- The proceeding to which the proposed order relates is:
 - Description of proceeding: Motion for Approval of PAGA Settlement Hearing
 - Date and time: January 19, 2023 at 9:00 am
 - Place: Santa Monica Courthouse Dept. R, 1725 Main Street, Santa Monica, CA 90401
- The proposed order was served on the other parties in the case.

Grainne Callan

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME:

Truesdell v. Fusiform, Inc.; Alex Matthews; Warren Mile Turner

CASE NUMBER:

21SMCV00463

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):

Grainne Callan, Esq. 1030 E. El Camino Real #374, Sunnyvale, CA 94087

b. My electronic service address is (*specify*): Grainne.Callan@callanlawoffice.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
Torey Favarote counsel for Fusiform Inc. DBA FactoryFour; Alex Matthews; Warren Mile Turner

b. To (*electronic service address of person served*): tfavarote@gleasonfavarote.com

c. On (*date*): December 27, 2022

☒ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

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

Date: December 27, 2021

Grainne Callan

(TYPE OR PRINT NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)

1 Grainne Callan (SBN 318962)
2 GRAINNE CALLAN, ESQ.
3 1030 E. El Camino Real #374
4 Sunnyvale, CA 94087
5 408-982-6224

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10 Attorney For Plaintiff, Todd Truesdell
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SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SANTA MONICA COURTHOUSE

TODD TRUEDELL, individually, and on
behalf of himself and others similarly situated,

PLAINTIFF,

vs.

FUSIFORM, INC. DBA FACTORYFOUR,
a Delaware Corporation; ALEX MATTHEWS,
an individual; WARREN MILE TURNER, an
individual; and DOES 1 through 50, inclusive,

DEFENDANTS.

FUSIFORM, INC. DBA FACTORYFOUR, a
Delaware Corporation; ALEX MATHEWS, an
individual; WARREN MILES TURNER, an
individual,

CROSS-COMPLAINANTS,

vs.

TODD TRUEDELL, an individual; and
DOES 51 through 100, inclusive,

CROSS-DEFENDANTS.

No. 21SMCV00463

**[PROPOSED] ORDER GRANTING
APPROVAL OF SETTLEMENT
AGREEMENT PURSUANT TO THE
PRIVATE ATTORNEYS GENERAL ACT**

Case Filed: March 8, 2021

1
2 Plaintiff Todd Truesdell's ("Plaintiff") Motion for Approval of Settlement Agreement
3 Pursuant to the Private Attorney General Act, was heard by the Court on January 19, 2023 in
4 Dept. R. The Court having reviewed the Motion for Approval of Settlement, the papers, the
5 arguments of counsel, and all other evidence and matters presented, and good cause appearing:

6 **IT IS HEREBY ORDERED, ADJUDGED and DECREED** that the Plaintiff's Motion
7 for Approval of PAGA Settlement is **GRANTED**, subject to the following findings and orders:

8 1. All terms used herein shall have the same meaning as defined in the Settlement
9 Agreement.

10 2. The Court here by approves the terms set forth in the Settlement Agreement for
11 settlement of PAGA claims in accordance with Labor Code section 2699 (l)(2), and finds that the
12 agreement is, in all respects, fair, adequate, and reasonable and directs the Parties to effectuate
13 the PAGA settlement according to the term set forth in the Settlement Agreement.

14 3. The Settlement Agreement is not an admission by Defendant or by any other
15 Released Party, nor is this Order a finding of the validity of any allegations or of any wrongdoing
16 by Defendants or any other Released Parties. Neither this Order, the Settlement Agreement, nor
17 any document referred to herein, nor any action taken to carry out the Settlement Agreement,
18 may be construed as, or may be used as, an admission of any fault, wrongdoing, omission,
19 concession, or liability whatsoever by or against defendants or any of the released parties.

20 4. Pursuant to the Settlement Agreement, Defendants shall pay the PAGA
21 Settlement Members the PAGA Settlement Awards totaling \$650.00.

22 5. Pursuant to the Settlement Agreement, Defendants shall pay the LWDA the
23 LWDA payment in the amount of \$1,875.00.

24 6. The court further orders, adjudges and decrees that Plaintiff and the PAGA
25 Settlement Members have released and forever discharged the Released Parties from and
26 regarding the Released Claims for the Covered Period.

27 7. This Final Judgment is entered pursuant to the Settlement Agreement and is
28 intended to Effectuate the settlement more fully described in the Settlement Agreement; and

1 8. The Court maintains jurisdiction to adjudicate any matters related to this Order
2 and Judgment and the Agreement.

3 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

4
5 DATED: 01/19/2023


HON. MARK H. EPSTEIN
JUDGE OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA


Mark H. Epstein / Judge