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8 *Attorney for Plaintiff JOAQUIN R. RODRIGUEZ*

FILED
Superior Court of California
County of Los Angeles

01/04/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: H. Garcia Deputy

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

JOAQUIN R. RODRIGUEZ, an individual;

Plaintiff,

v.

FAR EAST LANDSCAPE &
MAINTENANCE, INC., a California
Corporation; TONY J. MOON, an
individual; and DOES 1-100, inclusive;

Defendants.

Case Number: 21STCV01729

[Honorable Yolanda Orozco; Department 31]

**[PROPOSED] JUDGMENT ON APPROVED
PAGA SETTLEMENT**

Complaint Filed: January 15, 2021

TO THE HONORABLE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on November 15, 2021, the Court entered its Order on the
“Stipulation by All Parties for Order Approving Settlement Pursuant to California Labor Code Private
Attorneys’ General Act and Entering Judgment”. Good cause appearing, pursuant to *Labor Code*
Section 2699(l), the PAGA Settlement has been reviewed and is approved and Judgment is hereby
Ordered as follows:

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1 1. The PAGA settlement in the total amount of \$120,000.00 (the “PAGA Settlement
2 Sum”) is fair, adequate and reasonable as follows:

3 A. One-third (1/3) of the PAGA Gross Settlement Amount (“PGSA”), \$40,000.00,
4 plus \$5,750.00 for costs, totaling \$45,750.00, shall be paid to Plaintiff’s counsel Sirmabekian Law
5 Firm PC, for attorney’s fees and costs incurred on the PAGA claims, and an enhancement payment to
6 Plaintiff in the amount of \$500.00; and, \$2,500.00 shall be paid to the Settlement Administrator;

7 B. The remaining balance after deducting the amount being paid to Plaintiff’s
8 counsel for attorney’s fees, costs and expenses on the PAGA claims, \$71,250.00 (the “PAGA Net
9 Settlement Amount” or “PNSA”), shall be classified for tax purposes as civil penalties (“Civil Penalty
10 Allocation”), unless otherwise required by law, and shall be distributed as follows:

11 i. Seventy-Five Percent (75%) of the Civil Penalty Allocation,
12 \$53,437.50, shall be paid to the LWDA, which represents civil penalties payable to the LWDA under
13 the PAGA, *Labor Code section 2698, et seq.*;

14 ii. Twenty Five Percent (25%) of the Civil Penalty Allocation,
15 \$17,812.50, (the “Aggrieved Employee Amount”) shall be paid to the PAGA Members, pursuant to
16 *Labor Code § 2699(i)*, divided amongst PAGA Members based on each PAGA Member’s respective
17 number of pay periods worked for Defendants in California during the PAGA Period;

18 2. Pursuant to *Labor Code Section 2699(l)(3)*, Plaintiff’s counsel must serve this
19 Judgment on the LWDA.

20 3. The Entire Action is Dismissed with Prejudice, the Court retains continuing jurisdiction
21 over the Action and the Settlement, pursuant to *Code of Civil Procedure §664.6*.

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23
24 Dated: 01/04/2022



A handwritten signature in black ink, appearing to read "Yolanda Orozco".

Yolanda Orozco / Judge

Honorable Yolanda Orozco
Superior Court Judge

PROOF OF SERVICE
(§ 1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am a citizen of the United States of America; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 3435 Wilshire Boulevard, Suite 1710, Los Angeles, California 90010.

On the below-indicated date, I served the following document:

[PROPOSED] JUDGMENT ON APPROVED PAGA SETTLEMENT

on the interested parties in said action by placing:

___X,___ a true and correct copy,

and addressed as set forth on the attached Service List and delivered by one or more of the means set forth below:

☒ **BY ELECTRONIC SERVICE IN LIEU OF SERVICE BY MAIL, EXPRESS MAIL, OVERNIGHT DELIVERY, OR FACSIMILE TRANSMISSION:** In accordance with California Code of Civil Procedure section 1010.6, I caused the document to be sent to the person(s) below at the e-mail address(es) listed below.

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

EXECUTED: December 15, 2021
 At Los Angeles, California

Grigor Gregg Sirmabekhian
Grigor Gregg Sirmabekhian

[SERVICE LIST ON FOLLOWING PAGE]

SERVICE LIST

Katherine Den Bleyker [SBN 257187] Raina Singer [SBN 323116] LEWIS BRISBOIS BISGAARD & SMITH LLP 633 West 5th Street, Suite 4000 Los Angeles, California 90071 Email: <i>Katherine.DenBleyker@lewisbrisbois.com</i> Email: <i>Raina.Singer@lewisbrisbois.com</i> Email: <i>Severina.Villar@lewisbrisbois.com</i>	<i>Attorneys for Defendants</i>
Labor and Workforce Development Agency Department of Industrial Relations LWDA Attn. PAGA Administrator 1515 Clay Street, Ste. 801 Oakland, California 94612	<i>Labor and Workforce Development Agency (“LWDA”), filed/served online at:</i> <i>https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html</i>