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L.A. SUNSET 7600, INC., and
AMIN BADRUDIN

FILED
Superior Court of California
County of Los Angeles

04/12/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: R. Inostroza Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR
THE COUNTY OF LOS ANGELES – CENTRAL – STANLEY MOSK COURTHOUSE**

MOHAMED MAREY, an individual, on behalf
of himself, other current and former aggrieved
employees, and the State of California, as a
private attorneys general,

Plaintiff,

vs.

L.A. SUNSET 7600, INC., a California
corporation; AMIN BADRUDIN, an individual;
and DOES 1 through 25, Inclusive,

Defendant.

Case No. 21STCV18019

*[Assigned for all purposes before the
Honorable Richard Fruin, Department 15]*

**JOINT STIPULATION REQUESTING
COURT APPROVAL OF THE
PARTIES' PAGA SETTLEMENT**

COME NOW, Plaintiff, MOHAMED MAREY (“Plaintiff”), and Defendants L.A. SUNSET 7600, INC., and AMIN BADRUDIN (collectively “Defendants”) (hereinafter Plaintiffs and Defendants are collectively referred to as “the Parties”), by and through the Parties’ respective counsel of record, pursuant to *California Labor Code* section 2699(k)(2), hereby submit the foregoing

1 stipulation to this Court for the Parties' Private Attorneys General Act (hereinafter referred to as
2 "PAGA") settlement be approved by this Court.

3 **RECITALS**

4 WHEREAS after reviewing both the discovery provided by Defendant and the available
5 documents in this matter, Plaintiff recognizes there is substantial risk in continuing his pursuit of
6 seeking civil penalties pursuant to *Labor Code* 2699 et. seq., Labor Code Private Attorneys General
7 Act of 2004 ("PAGA Claims") in this matter.
8

9 WHEREAS the Parties have agreed to reach a settlement of the PAGA Claims, based on
10 weekly pay periods worked by the PAGA class between March 6, 2020 to December 13, 2021 (93
11 weeks between March 6, 2020 and December 13, 2021 for an average of 8 full time employees and 4
12 part time employees in each period)) ("PAGA Period" or "Relevant Period").
13

14 **IT IS HEREBY STIPULATED AND PROPOSED BY THE PARTIES HERETO AS
FOLLOWS:**

- 15 1. The Parties request this Court approve \$11,000.00 in total for settlement of the PAGA Claims
16 as follows:

- 17 a. \$2,355.00 to the Third-Party Administrator, ILYM Group, Inc. as and for
18 administrative costs;
19
20 b. \$478.49 to Plaintiff's counsel, J.B. Twomey Law ("Plaintiff's Counsel"), as and for
21 actual out-of-pocket costs;
22
23 c. \$1,833.50 to Plaintiff's Counsel as and for reasonable attorneys' fees;
24
25 d. \$4,749.76 to the (i.e., 75% of \$6,333.01) to the California Labor and Workforce
26 Development Agency ("LWDA");
27
28 e. \$1,583.25 (i.e., 25% of \$6,333.01) to Plaintiff MOHAMED MAREY and
Defendants' other current and former California employees ("PAGA Settlement
Group Members") by calculating the total number of pay periods worked by all PAGA
Settlement Group Members during the PAGA Period to get the "Total Pay Periods."

1 \$1,583.25 will then be divided by the Total Pay Periods, yielding the amount to be
2 paid to each PAGA Settlement Group Member for each pay period. Each PAGA
3 Settlement Group Member's share of the settlement will be calculated by multiplying
4 the amount to be paid to each PAGA Settlement Group Member for each pay period
5 by the number of pay periods worked by that PAGA Settlement Group Member during
6 the PAGA Period.

- 7
- 8 2. Under the settlement, Plaintiff will pay as much in attorneys' fees and costs as the PAGA
9 Settlement Group Members.
- 10 3. Defendants have reviewed their records and have verified their compliance with CA
11 employment laws that underly the PAGA Claims in this matter. See Declaration of Amin
12 Badruin, ¶¶ 2, 3.

13 **IT IS SO STIPULATED.**

14

15 Dated: April 8, 2022

JAIN LAW OFFICES, P.C.

16

17 By: 

18 Kunal Jain
19 Attorney for Plaintiff,
20 MOHAMED MAREY

21 Dated: April 8, 2022

RUPAL LAW

22

23 By: 

24 Mandeep S. Rupal
25 Attorneys for Defendants,
26 L.A. SUNSET 7600, INC.; AMIN BADRUDIN
27
28

~~**[PROPOSED]**~~ ORDER

Plaintiff, MOHAMED MAREY (“Plaintiff”), and Defendants L.A. SUNSET 7600, INC., and AMIN BADRUDIN (collectively “Defendants”) (hereinafter Plaintiffs and Defendants are collectively referred to as “the Parties”), by and through the Parties’ respective counsel of record, pursuant to *California Labor Code* section 2699(k)(2), submitted a Joint Stipulation to this Court for the Parties’ Private Attorneys General Act (hereinafter referred to as “PAGA”) settlement be approved by this Court.

Plaintiff submitted the same Joint Stipulation and this [Proposed] Order electronically to the Labor and Workforce Development Agency / Department of Industrial Relations (hereinafter referred to as “LWDA”) (<https://dir.tfaforms.net/315>) on the same date Plaintiff filed this stipulation on behalf of the Parties.

Upon review of the Parties’ Joint Stipulation, the Court hereby **ORDERS** as follows:

1. The Parties’ \$11,000.00 PAGA settlement is approved.
 - a. Defendants shall pay \$2,355.00 to the Third-Party Administrator, ILYM Group, Inc. as and for administrative costs.
 - b. Defendants shall pay \$478.49 to Plaintiff’s counsel, J.B. Twomey Law, as and for out-of-pocket costs.
 - c. Defendants shall pay \$1,833.50 to Plaintiff’s Counsel, J.B. Twomey Law, as and for reasonable attorney’s fees.
 - d. Defendants shall pay \$4,749.76 to the LWDA (*i.e.*, 75% of \$6,333.01).
 - e. Defendants shall pay \$1,583.25 to Plaintiff MOHAMED MAREY and Defendants’ other current and former California employees (“PAGA Settlement Group Members”) (*i.e.*, 25% of \$6,333.01) by calculating the total number of pay periods worked by all PAGA Settlement Group Members during the period March 6, 2020 and December 13, 2021 to get the “Total Pay Periods.” \$1,583.25 will then be divided by the Total Pay Periods, yielding the amount to

1 be paid to each PAGA Settlement Group Member for each pay period. Each PAGA
2 Settlement Group Member's share of the settlement will be calculated by multiplying the
3 amount to be paid to each PAGA Settlement Group Member for each pay period by the
4 number of pay periods worked by that PAGA Settlement Group Member during the PAGA
5 Period.

6
7 2. Plaintiff is to give Notice of this Order.

8
9 **IT IS SO ORDERED.**



Richard L. Fruin Jr.

10
11 DATED: April 12, 2022

Richard L. Fruin / Judge

Hon. Richard Fruin, Judge Superior Court State
of California, Los Angeles County