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6 **KINGSLEY SZAMET & LY**

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11 16133 Ventura Blvd., Suite 1200
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11 **NAKASE LAW FIRM, INC.**

12 Brad Nakase (SBN 236226)
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14 2221 Camino Del Rio South, Suite 300
15 San Diego, CA 92108
16 Tel: (619) 550-1321

15 Attorneys for Plaintiffs and the aggrieved employees

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **FOR THE COUNTY OF LOS ANGELES**

18 STEPHEN CLEGG and MICHAEL
19 EMMENS; individually, and on behalf of other
20 aggrieved employees;

20 **PLAINTIFFS,**

21 **v.**

22 BOB'S DISCOUNT FURNITURE, LLC, a
23 Massachusetts Limited Liability Company;
24 and DOES 1 thru 10, inclusive,

24 **DEFENDANTS.**

Case No. 21STCV15281
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Jon Takasugi
Department 17

**INDIVIDUAL AND REPRESENTATIVE
ACTION**

**NOTICE OF ENTRY OF ORDER
GRANTING PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS'
GENERAL ACT ("PAGA")
SETTLEMENT AND FINAL JUDGMENT**

Complaint Filed: April 22, 2021
Trial Date: None Set

**TO: THE LABOR AND WORKFORCE DEVELOPMENT AGENCY, AND TO ALL
PARTIES AND THEIR COUNSEL OF RECORD:**

NOTICE IS GIVEN that on June 6, 2024, the Court entered an Order Granting Plaintiffs' Motion for Approval of Private Attorneys' General Act ("PAGA") Settlement in the above-captioned matter. A true and correct copy of this Order is attached as Exhibit A.

FURTHER NOTICE IS GIVEN that on June 6, 2024, the Court also entered a Final Judgment in this matter. A true and correct copy of this Order is attached as Exhibit B.

COHELAN KHOURY & SINGER
NAKASE LAW FIRM, INC.

Dated: June 20, 2024

By: 
Marta Manus, Esq.
Counsel for Plaintiffs STEPHEN CLEGG and
MICHAEL EMMENS

EXHIBIT A

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)
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Tel.: (619) 595-3001/Fax: (619) 595-3000

Attorneys for Plaintiffs and the aggrieved employees

[Additional Attorneys Listed on the Following Page]

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

STEPHEN CLEGG and MICHAEL
EMMENS; individually, and on behalf of
other aggrieved employees;

PLAINTIFFS,

v.

BOB'S DISCOUNT FURNITURE, LLC, a
Massachusetts Limited Liability Company;
and DOES 1 thru 10, inclusive,

DEFENDANTS.

Case No. 21STCV15281

[Case Assigned for All Purposes to Hon. Jon. R.
Takasugi in Dept. 17]

**[PROPOSED] ORDER GRANTING
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: June 3, 2024

Time: 9:30 AM

Dept.: 17

Complaint Filed: April 22, 2021

Trial Date: None Set

Reservation No. 212226160896

KINGSLEY & KINGSLEY, APC

Eric B. Kingsley (SBN 185123)

eric@kingsleykingsley.com

Kelsey M. Szamet (SBN 260264)

kelsey@kingsleykingsley.com

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Brad Nakase (SBN 236226)

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Jared Peterson, Esq. (SBN 270473)

jared@nakaselawfirm.com

2221 Camino Del Rio South, Suite 300

San Diego, CA 92108

Tel: (619) 550-1321

Attorneys for Plaintiffs and the aggrieved employees

PROPOSED ORDER

The Motion for Approval of Representative Action Settlement (“Motion”) came before this Court, the Honorable Jon R. Takasugi, presiding. The Court, having considered the papers submitted in support of the motion of the parties, **HEREBY ORDERS THE FOLLOWING:**

Having considered Plaintiffs’ Motion, and all legal authorities and documents submitted in support thereof, including the PAGA Settlement Agreement (“Settlement Agreement” or “Agreement”), attached to the Declaration of Kelsey M. Szamet as Exhibit “1”, and good cause appearing, IT IS HEREBY ORDERED that Plaintiff’s Motion is GRANTED, subject to the following findings and orders:

1. The Court finds the Settlement Agreement is fair and reasonable.
2. The Court approves the Gross Settlement Amount of \$900,000.00.¹
3. The Court approves the PAGA Penalties in the amount of \$562,222.68.
4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in the amount of \$421,667.01.
5. The Court approves the PAGA Counsel’s request for attorney fees of \$300,000.00.
6. The Court approves the PAGA Counsel’s Litigation Expenses Payment of \$19,077.32.
7. The Court approves Plaintiffs’ Service Payments of \$5,000.00 each to Plaintiffs STEPHEN CLEGG and MICHAEL EMMENS.
8. The Parties are ordered to carry out the terms of the Agreement.
9. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction over this action and the Parties and the Aggrieved Employees including after the entry of this Order, to the fullest extent necessary to interpret, enforce and effectuate the terms and intent of the Settlement Agreement and this Order.

¹ Unless otherwise defined herein, all capitalized terms shall have the meaning assigned to them in the Agreement.

1 DATED: 06/06/2024

2 JUDGE OF THE SUPERIOR COURT



3 *Jon R. Takasugi*

4 Jon R. Takasugi / Judge

(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 April 22, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER GRANTING APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

<i>Counsel for Defendant</i>	<i>Counsel for Plaintiffs</i>
Kathy E. Le, Esq. Kelli Dreger, Esq. JACKSON LEWIS P.C. 200 Spectrum Center Drive, Suite 500 Irvine, CA 92618 Kathy.Le@jacksonlewis.com Kelli.Dreger@jacksonlewis.com	Brad Nakase, Esq. Jared Peterson, Esq. NAKASE LAW FIRM, INC. 2221 Camino Del Rio South, Suite 300 San Diego, CA 92108 brad@NakaseLawFirm.com jared@NakaseLawfirm.com COHELAN KHOURY & SINGER Michael D. Singer msinger@ckslaw.com Marta Manus mmanus@ckslaw.com 605 C Street, Suite 200 San Diego, California 92101

[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 TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[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 April 22, 2024, at Woodland Hills, California.



Michelle Tanzer

EXHIBIT B

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)
msinger@ckslaw.com
Marta Manus (SBN 260132)
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Attorneys for Plaintiffs and the aggrieved employees

[Additional Attorneys Listed on the Following Page]

FILED
Superior Court of California
County of Los Angeles

06/06/2024

David W. Slayton, Executive Officer / Clerk of Court

By: M. Ventura Deputy

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

STEPHEN CLEGG and MICHAEL
EMMENS; individually, and on behalf of
other aggrieved employees;

PLAINTIFFS,

v.

BOB'S DISCOUNT FURNITURE, LLC, a
Massachusetts Limited Liability Company;
and DOES 1 thru 10, inclusive,

DEFENDANTS.

Case No. 21STCV15281

[Case Assigned for All Purposes to Hon. Jon. R.
Takasugi in Dept. 17]

[PROPOSED] FINAL JUDGMENT

Date: June 3, 2024

Time: 9:30 AM

Dept.: 17

Complaint Filed: April 22, 2021

Trial Date: None Set

Reservation No. 212226160896

KINGSLEY & KINGSLEY, APC

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2221 Camino Del Rio South, Suite 300
San Diego, CA 92108
Tel: (619) 550-1321

Attorneys for Plaintiffs and the aggrieved employees

1 The Motion for Approval of Representative Action Settlement came before this Court, on
2 June 3, 2024.

3 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

4 The Court having entered an order finally approving the representative action settlement
5 as reflected in the Parties' joint PAGA Settlement Agreement ("Agreement"), hereby enters
6 FINAL JUDGMENT in favor of Plaintiff and the Settlement Class in the amount of \$900,000.00.
7 This Judgment is intended to be a final disposition of the above captioned action in its entirety,
8 and is intended to be immediately appealable.

9 The Court retains jurisdiction over the parties to enforce the terms of the judgment.

10
11 DATED: 06/06/2024



12 JUDGE OF THE SUPERIOR COURT

13 Jon R. Takasugi / Judge
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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On April 22, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] FINAL JUDGMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

<i>Counsel for Defendant</i>	<i>Counsel for Plaintiffs</i>
Kathy E. Le, Esq. Kelli Dreger, Esq. JACKSON LEWIS P.C. 200 Spectrum Center Drive, Suite 500 Irvine, CA 92618 Kathy.Le@jacksonlewis.com Kelli.Dreger@jacksonlewis.com	Brad Nakase, Esq. Jared Peterson, Esq. NAKASE LAW FIRM, INC. 2221 Camino Del Rio South, Suite 300 San Diego, CA 92108 brad@NakaseLawFirm.com jared@NakaseLawfirm.com COHELAN KHOURY & SINGER Michael D. Singer msinger@ckslaw.com Marta Manus mmanus@ckslaw.com 605 C Street, Suite 200 San Diego, California 92101

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Michelle Tanzer