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

EBONY RUSSELL, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

LBS FINANCIAL CREDIT UNION, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 21STCV02472

[Hon. Holly J. Fujie, Department 56]

**[PROPOSED] ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND FINAL JUDGMENT**

Date: December 22, 2022
Time: 8:30 a.m.
Department: 23

Reservation ID: 346042629905

Complaint Filed: January 21, 2021

1 The motion for an Order Granting Approval of PAGA Settlement was filed by Plaintiff, Ebony
2 Russell, on November 30, 2022, and a hearing was held before this Court on December 22, 2022.

3 After considering the papers and evidence, arguments of counsel, and all other matters presented
4 to the Court, and having taken the matter under submission, **IT IS HEREBY ORDERED AND**
5 **ADJUDGED** as follows:

6 1. The motion for approval of the Labor Code Private Attorneys General Act of 2004
7 (“PAGA”) settlement is granted. Plaintiff has fairly and adequately protected the interests of the State,
8 and Plaintiff’s Counsel are qualified to serve as counsel for the Plaintiff in her individual and
9 representative capacity. The Joint Stipulation of PAGA Settlement (the “Agreement”) submitted by the
10 Parties appears to be fair, adequate, and reasonable in light of PAGA’s policies and in furtherance of
11 PAGA’s purposes.

12 2. The Parties are hereby ordered to carry out the terms of the Agreement.

13 3. Within 14 days of this Order, Defendant is hereby ordered to deposit the \$160,000.00
14 Settlement Amount with the Phoenix Settlement Administrators (the “Administrator”).

15 4. Within 14 days of receipt of the Settlement Amount, the Administrator shall distribute the
16 Settlement Amount as follows:

- 17 • \$53,333.33 as Attorneys’ Fees to Plaintiff’s Counsel;
- 18 • \$1,288.44 as Costs to Plaintiff’s Counsel;
- 19 • \$3,500.00 as Administration Costs to the Administrator;
- 20 • \$10,000.00 as a General Release Payment to Plaintiff;
- 21 • \$68,908.67 as PAGA Penalties to the Labor and Workforce Development Agency; and
- 22 • \$22,969.56 as PAGA Penalties to Aggrieved Employees, allocated pursuant to the
23 formula set forth in the Agreement.

24 5. The Court grants approval of the settlement in accordance with the terms of the
25 Agreement and this Order.

26 6. The Court hereby enters final judgment in this case in accordance with the terms of the
27 Agreement and this Order. This Order shall constitute a Final Judgment. Pursuant to Code of Civil
28 Procedure section 668.5, judgment shall be entered as of the filing of this Order and Final Judgment.

Without affecting the finality of the settlement or judgment entered thereon, this Court shall retain exclusive and continuing jurisdiction over the action and the Parties for purposes of enforcing and interpreting this Order.

7. Except as otherwise provided in the Agreement, the Parties are to bear their own costs and attorneys' fees.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

DATED: _____, 2022

THE HONORABLE HOLLY J. FUJIE