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**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: May 28, 2024

Time: 9:30 AM

Dept.: 17

Complaint Filed: April 22, 2021

Trial Date: None Set

Reservation No. 950803998414

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Attorneys for Plaintiffs and the aggrieved employees

1 **[PROPOSED] ORDER**

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

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

- 10 1. The Court finds the Settlement Agreement is fair and reasonable.
- 11 2. The Court approves the Gross Settlement Amount of \$900,000.00.¹
- 12 3. The Court approves the PAGA Penalties in the amount of \$562,222.68.
- 13 4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in
14 the amount of \$421,667.01.
- 15 5. The Court approves the PAGA Counsel’s request for attorney fees of
16 \$300,000.00.
- 17 6. The Court approves the PAGA Counsel’s Litigation Expenses Payment of
18 \$19,077.32.
- 19 7. The Court approves Plaintiffs’ Service Payments of \$5,000.00 each to Plaintiffs
20 STEPHEN CLEGG and MICHAEL EMMENS.
- 21 8. The Parties are ordered to carry out the terms of the Agreement.
- 22 9. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction
23 over this action and the Parties and the Aggrieved Employees including after the
24 entry of this Order, to the fullest extent necessary to interpret, enforce and
25 effectuate the terms and intent of the Settlement Agreement and this Order.
- 26

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

DATED: _____

JUDGE OF THE SUPERIOR COURT

(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 19, 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:

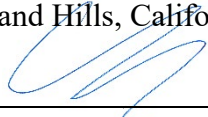
<i>Counsel for Defendant</i>	<i>Counsel for Plaintiffs</i>
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing (“EF”) System (<https://dir.tfaforms.net/315>) 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 19, 2024, at Woodland Hills, California.



Michelle Tanzer