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Attorneys for Plaintiffs Jack Williams, Christopher Todd, and all Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

JACK WILLIAMS, an individual, and
CHRISTOPHER TODD, an individual, on
behalf of the State of California, as a private
attorney general,

PLAINTIFFS,

v.

PACE SUPPLY CORP.; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

CASE NO. SCV-268171

[Case Assigned for All Purposes to Hon.
Bradford DeMeo in Dept. 17]

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

Complaint Filed:	April 12, 2021
FAC Filed:	October 12, 2021
Trial Date:	None Scheduled

1 **[PROPOSED] ORDER**

2 Pursuant to the Joint Stipulation for Approval of Representative Action Settlement
3 submitted by Plaintiffs JACK WILLIAMS and CHRISTOPHER TODD (“Plaintiffs”), on behalf
4 of themselves and the people of the State of California and as an “aggrieved employee” under the
5 Labor Code Private Attorneys General Act of 2004, §2699, et seq. (“PAGA”) and Defendant
6 PACE SUPPLY CORP (“Defendant”) (collectively “the Parties”) and good cause appearing:

7 Having considered the Parties’ Joint Stipulation, and all legal authorities and documents
8 submitted in support thereof, including the PAGA Action Settlement Agreement (“Settlement
9 Agreement” or “Settlement”), attached hereto as Exhibit “1”, and good cause appearing, IT IS
10 HEREBY ORDERED that the Parties’ request is GRANTED, subject to the following findings
11 and orders:

- 12 a) The Court grants approval of the Settlement Agreement based upon the
13 terms set forth in the attached Settlement Agreement. The Court finds the
14 Settlement Agreement is fair, adequate, and reasonable to the Aggrieved
15 Employees.
- 16 b) The “Aggrieved Employees” covered by the Settlement Agreement are
17 defined as “Defendant's current and former non-exempt employees who
18 worked for Defendant in California from August 10, 2019 to May 14,
19 2022.”
- 20 c) The Gross Settlement Amount is \$950,000.
- 21 d) After deduction of Individual PAGA Payments, the LWDA PAGA
22 Payment, Named Plaintiffs Service Payment, Plaintiffs’ Counsel Fees
23 Payment, Plaintiffs’ Counsel Litigation Expenses Payment, and the
24 Administration Expenses Payment as detailed in the Settlement
25 Agreement, the remaining Net Settlement Amount is anticipated to be
26 \$585,833.33 is allocated as PAGA penalties.
- 27 e) The Court approves the PAGA Penalties to be paid from the Gross
28 Settlement Amount, with 75% (estimated at \$439,375.00) allocated to the

1 LWDA PAGA Payment and 25% (estimated at \$146,458.33) allocated to
2 the Individual PAGA Payments.

3 f) The Court orders the Parties to carry out their duties as set forth in the
4 Settlement Agreement.

5
6
7 **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 September 9, 2022, 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:

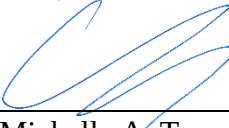
GORDON REES SCULLY MANSUKHANI, LLP MICHAEL D. BRUNO mbruno@grsm.com RACHEL WINTTERLE rwintterle@grsm.com 275 Battery St, Suite 2000 San Francisco, CA 94111 Attorneys for Defendant	TOJARIEH LAW FIRM, PC JOSEPH TOJARIEH jft@tojariehlaw.com 10250 Constellation Blvd, Ste 100 Los Angeles, CA 90067 SCHEPPACH BAUER PC JOHN M. SCHEPPACH jmsheppach@sbpc.law 23181 Verdugo Drive, Ste 105-A Laguna Hills, CA 92653 Attorneys for Plaintiff
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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 below 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 September 9, 2022, at Woodland Hills, California.



Michelle A. Tanzer