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SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

RAUL ANTONIO CASTRO,

Plaintiff,

v.

CLAY LACY AVIATION, INC., and DOES 1 to  
100,

Defendants.

) Case No. 21VECV00304  
) Hon. Huey Cotton in Dept. A  
)

) **[PROPOSED] ORDER GRANTING**  
) **PLAINTIFF'S MOTION FOR COURT**  
) **APPROVAL OF PAGA SETTLEMENT**  
) **AND ENTERING JUDGMENT**

) Date: August 14, 2024  
) Time: 8:30 a.m.  
) Dept.: A  
)

) Action Filed: March 8, 2021  
) Trial Date: November 4, 2024  
)

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**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR COURT APPROVAL  
OF PAGA SETTLEMENT**

1 **[PROPOSED] ORDER AND JUDGMENT**

2 This matter came on for hearing before the Honorable Huey Cotton, Dept. A on  
3 \_\_\_\_\_, 2024, at \_\_: \_\_.m., in the Los Angeles Superior Court located at 6230 Sylmar  
4 Ave., Van Nuys, California, 91401, on Plaintiff Raul Antonio Castro's ("Plaintiff") Motion for  
5 Court Approval of PAGA Settlement, and for Attorneys' Fees and Costs, representative  
6 enhancement, and Administrative Fees ("PAGA Approval Motion"). The Court, having  
7 considered the papers filed in support of the motion; arguments of counsel; and all files, records,  
8 and other matters properly before the Court, hereby determines as follows:

9 (A) The settlement was entered into in good faith, and the terms of the settlement are  
10 fair, reasonable and adequate and comply with the requirements of Labor Code § 2699, after  
11 considering the maximum potential recovery, the merits of Plaintiff's claims, and the means by  
12 which the parties arrived at the settlement;

13 (B) The fees requested by Plaintiff's counsel are reasonable given: (a) the hours worked  
14 by Plaintiff's counsel; (b) the results achieved; (c) the risks of litigation; (d) the skill required and  
15 the quality of work; and (e) the contingent nature of the fee.

16 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED, ADJUDGED AND**  
17 **DECREEED AS FOLLOWS:**

18 (1) Plaintiff's PAGA Approval Motion is **GRANTED**.

19 (2) The Court approves the allocation and settlement of penalties under the Private  
20 Attorney General Act ("PAGA") in this matter in the total amount of Seven Hundred and Sixty  
21 Thousand Dollars and Zero Cents (\$760,000.00) ("PAGA Settlement"). In accordance with the  
22 Settlement Agreement, Plaintiff's counsel is awarded attorney's fees in the amount of \$266,000.00  
23 and litigation costs in the amount of \$40,000.00. Additionally, Plaintiff's enhancement request of  
24 \$5,000.00 is granted and the settlement administration expenses are awarded in the amount of  
25 \$6,950.00. The Net Distribution Amount of the settlement is \$446,050.00, with \$331,537.50  
26 payable to the California Labor and Workforce Development Agency (LWDA) for its share of  
27 PAGA penalties (75%), and \$110,512.50 payable to the Aggrieved Employees (25%).

28 (3) As of the date of this order, all Aggrieved Employees, including Plaintiff, are

1 deemed to release, on behalf of themselves and their respective former and present representatives,  
2 agents, attorneys, heirs, administrators, successors and assigns, the Released Parties from all  
3 claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the  
4 PAGA Period facts stated in the Operative Complaint.

5 (4) Plaintiff shall provide Notice of this Order to the LWDA within 14 calendar days  
6 after its entry.

7 (5) Judgment is entered into pursuant to this order, with the Court retaining jurisdiction  
8 to enforce its terms pursuant to California Code of Civil Procedure section 664.6.

9 (6) Nothing in this Order or the Settlement shall be construed as an admission or  
10 concession by any party. The Settlement and this resulting Order and entry of judgement simply  
11 represent a compromise of disputed allegations.

12  
13  
14 Date: \_\_\_\_\_

\_\_\_\_\_  
Honorable Huey Cotton  
Judge of the Superior Court

1 **CALIFORNIA STATE COURT PROOF OF SERVICE**

2 Raul Antonio Castro v. Clay Lacy Aviation, Inc.  
3 Los Angeles Superior Court Case No. 21VECV00304

4 STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

5 At the time of service, I was over 18 years of age and not a party to this action. My  
6 business address is 45 Fremont Street, Suite 3000, San Francisco, CA 94105.

7 On August 14, 2024, I served true copies of the following document(s):

8 I served the documents on the following persons at the following addresses (including fax  
9 numbers and e-mail addresses, if applicable): **[PROPOSED] ORDER GRANTING  
10 PLAINTIFF'S MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT AND  
11 ENTERING JUDGMENT**

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22 The documents were served by the following means:

23 ☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an  
24 agreement of the parties to accept service by e-mail or electronic transmission, I caused the  
25 documents to be sent from e-mail address [dmayorga@ohaganmeyer.com](mailto:dmayorga@ohaganmeyer.com) to the persons at  
26 the e-mail addresses listed above. I did not receive, within a reasonable time after the  
27 transmission, any electronic message or other indication that the transmission was  
28 unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

Executed on August 14, 2024, at San Francisco, California.

*Dolores A. Mayorga*  
Dolores A Mayorga