

RAUL ANTONIO CASTRO.

Plaintiff,

V.

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

Defendants.

Case No. 1240024873

**STIPULATION TO APPROVE PAGA
PORTION OF SETTLEMENT;
[PROPOSED] ORDER**

Action Filed: March 8, 2021

1 WHEREAS, this matter was compelled to arbitration on or about November 10, 2021.

2 WHEREAS, the parties in this matter have agreed to a confidential settlement which
3 purports to settle Claimant's individual claims which include Claimant's individual PAGA claims.

4 The parties stipulate that the settlement amount for Plaintiff's individual PAGA claims is as
5 follows:

6 1. Nine Hundred and Ten Dollars and Zero cents (\$910.00) is payment for settlement
7 of all alleged individual PAGA penalties ("PAGA Payment"). The PAGA Payment shall be paid by
8 check made payable to "Frontier Law Center Client Trust Account", which will then disburse 75%
9 of that amount (\$682.50) by check payable to the Labor and Workforce Development Agency, and
10 the remaining 25% (\$267.50) by check payable to Raul Antonio Castro.

11 2. Parties stipulate that the penalties are fair and reasonable and request that the
12 arbitrator approve the penalties as fair and reasonable pursuant to Labor Code §2699 which states
13 in relevant part: "The superior court shall review and approve any settlement of any civil action
14 filed pursuant to this part. The proposed settlement shall be submitted to the agency at the same
15 time that it is submitted to the court."

16 3. Parties request the arbitrator enter the attached order to comply with the code.

17 Dated: February 15, 2023

JANELLE CARNEY – ATTORNEY AT LAW, APC
FRONTIER LAW CENTER

18 By: S/ Janelle Carney

19 Janelle Carney, Attorney for Plaintiff
20 Attorney for Plaintiff, Raul Antonio Castro

21
22 Dated: February 15, 2023

LEWIS BRISBOIS BISGAARD & SMITH LLP

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24
25 By: S/ Daniel H. Qualls

26 DANIEL H. QUALLS
27 BRITTANY A. VULCAN
28 Attorneys for Defendant
CLAY LACY AVIATION, INC

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the individual PAGA settlement for Claimant Raul Castro is approved as fair and reasonable as follows:

1. Nine Hundred and Ten Dollars and Zero cents (\$910.00) is payment for settlement of all alleged individual PAGA penalties ("PAGA Payment"). The PAGA Payment shall be paid by check made payable to "Frontier Law Center Client Trust Account", which will then disburse 75% of that amount (\$682.50) by check payable to the Labor and Workforce Development Agency, and the remaining 25% (\$267.50) by check payable to Raul Antonio Castro.

Dated: 2/15/2023

DocuSigned by:
Hon. Patrick J. Walsh (Ret.)
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Patrick Walsh, Arbitrator