

1 Janelle Carney (SBN 201570)
JANELLE CARNEY-ATTORNEY AT LAW, APC
2 14758 Pipeline Ave., Suite E
Chino Hills, CA 91709-6025
3 Telephone: (909) 521-9609 / Facsimile: (909) 393-0471
4 E-mail: janelle@janellecarneylaw.com

5 Adam Rose (SBN 210880)
adam@frontierlawcenter.com
6 Manny Starr (SBN 319778)
manny@frontierlawcenter.com
7 Dan Ginzburg (SBN 327338)
dan@frontierlawcenter.com
8 FRONTIER LAW CENTER
9 23901 Calabasas Road, #1084
Calabasas, CA 91302
10 Telephone: (818) 914-3433 / Facsimile: (818) 914-3433

11 Attorneys for Plaintiff Raul Antonio Castro

12
13 SUPERIOR COURT OF CALIFORNIA
14 COUNTY OF LOS ANGELES
15

16 RAUL ANTONIO CASTRO,
17 Plaintiff,

18 v.

19 CLAY LACY AVIATION, INC., and DOES 1 to
20 100,
21 Defendants.

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

) **NOTICE OF ENTRY OF ORDER**
) **GRANTING PLAINTIFF'S MOTION**
) **FOR COURT APPROVAL OF PAGA**
) **SETTLEMENT AND ENTERING**
) **JUDGMENT**

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

1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:
2 PLEASE TAKE NOTICE that on August 30, 2024, the Court entered an order and
3 judgment granting Plaintiff's Motion for Court Approval of PAGA Settlement and Entering
4 Judgment. A true and correct copy of said order and judgment is attached hereto as Exhibit 1.

5
6
7 Dated: August 31, 2024

JANELLE CARNEY – ATTORNEY AT LAW, APC
FRONTIER LAW CENTER

9
10 

By:

11 Janelle Carney
12 Attorney for Plaintiff Raul Antonio Castro
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JANELLE CARNEY (SBN 201570)
JANELLE CARNEY-ATTORNEY AT LAW, APC
14758 Pipeline Ave., Suite E
Chino Hills, CA 91709-6025
Telephone: (909) 521-9609 / Facsimile: (909) 393-0471
E-mail: janelle@janellecarneylaw.com

ADAM ROSE (SBN 210880)
adam@frontierlawcenter.com
MANNY STARR (SBN 319778)
manny@frontierlawcenter.com
DAN GINZBURG (SBN 327338)
dan@frontierlawcenter.com
FRONTIER LAW CENTER
23901 Calabasas Road, #1084
Calabasas, CA 91302
Telephone: (818) 914-3433 / Facsimile: (818) 914-3433

Attorneys for Plaintiff Raul Antonio Castro

O'HAGAN MEYER LLP
DANIEL H. QUALLS, SB# 109036
E-Mail: DQualls@OHaganMeyer.com
J. CRUZ ZAVALA-GARCIA SB# 332671
E-Mail: CZavala@OHaganMeyer.com
One Embarcadero Center, Suite 2100
San Francisco, California 94111
Telephone: (312) 422-6100

Attorneys for Defendant CLAY LACY AVIATION, INC.

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
)

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

FILED
Superior Court of California
County of Los Angeles
08/30/2024
David W. Slayton, Executive Officer / Clerk of Court
By: R. Redmond Deputy

~~PROPOSED~~ ORDER AND JUDGMENT

This matter came on for hearing before the Honorable Huey Cotton, Dept. A on August 29, 2024, at 8 : 30 a.m., in the Los Angeles Superior Court located at 6230 Sylmar Ave., Van Nuys, California, 91401, on Plaintiff Raul Antonio Castro's ("Plaintiff") Motion for Court Approval of PAGA Settlement, and for Attorneys' Fees and Costs, representative enhancement, and Administrative Fees ("PAGA Approval Motion"). The Court, having considered the papers filed in support of the motion; arguments of counsel; and all files, records, and other matters properly before the Court, hereby determines as follows:

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

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

**GOOD CAUSE APPEARING, IT IS HEREBY ORDERED, ADJUDGED AND
DECREED AS FOLLOWS:**

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

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

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

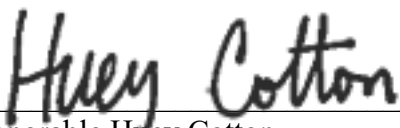
1 deemed to release, on behalf of themselves and their respective former and present representatives,
2 agents, attorneys, heirs, administrators, successors and assigns, the Released Parties from all
3 claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the
4 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: 08/30/2024



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**

12 Janelle Carney
13 Attorney at Law, APC
14 14758 Pipeline Ave., STE E
15 Chino Hills, CA 91709

*Attorneys for Plaintiff RAUL ANTONIO
CASTRO*

Telephone: (909) 521-9609
Facsimile: (909) 393-0471
Email: Janelle@JanelleCarneylaw.com

16 Adam Rose
17 Manny Starr
18 Daniel Ginzburg
19 FRONTIER LAW CENTER
20 23901 Calabasas Road #2074
21 Calabasas, CA 91302

Telephone: (818) 914-3433
Facsimile: (818) 914-3433
Email: adam@frontierlawcenter.com;
manny@frontierlawcenter.com;
dan@frontierlawcenter.com

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 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

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On August 31, 2024, I served the foregoing document described as:

NOTICE OF ENTRY OF ORDER GRANTING PLAINTIFF'S MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT AND ENTERING JUDGMENT

on INTERESTED PARTIES in this action as stated below:

O'HAGAN MEYER

Daniel H. Qualls

dqualls@ohaganmeyer.com

Cruz Zavala

czavala@ohaganmeyer.com

One Embarcadero Center, Suite 2100

San Francisco, CA 94111

Adam Rose (210880)

adam@frontierlawcenter.com

Manny Starr (319778)

manny@frontierlawcenter.com

FRONTIER LAW CENTER

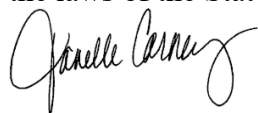
23901 Calabasas Road, #2074

Calabasas, CA 91302

XX BY E-MAIL : I electronically served the above-mentioned document to each of the above recipients at their respective e-mail addresses. My e-address is: Janelle@JanelleCarneyLaw.com

Executed on August 31, 2024 at Chino Hills, California.

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



Janelle Carney