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8 Attorneys for Plaintiffs WILLIAM GARCIA RAYA JR., LAURIELLE CUTHBERTSON, and
JEFFREY THOMAS STRAHL on behalf of the general public as private attorney general
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 WILLIAM GARCIA RAYA, JR. on
behalf of the general public as private
attorney general,
13

14 Plaintiff,

15 v.

16 SFM, LLC, a California Limited Liability
Company; SF Markets, LLC, dba
17 SPROUTS FARMERS MARKET, a
Delaware Limited Liability Company; and
DOES 1-50, inclusive,
18

19 Defendants.

20 LAURIELLE CUTHBERTSON. on
behalf of the general public as private
attorney general,
21

22 Plaintiff,

23 v.

24 SFM, LLC, a California Limited Liability
Company; SF Markets, LLC, dba
25 SPROUTS FARMERS MARKET, a
Delaware Limited Liability Company; and
DOES 1-50, inclusive,
26

27 Defendants.
28

Case No. 21STCV18228
Related to Case Nos. 21STCV43022 and
21STCV4015

Judge: David Sotelo
Dept: 40

**PROOF OF SERVICE OF ORDER
APPROVING SETTLEMENT OF
PRIVATE ATTORNEYS GENERAL
ACT CLAIMS AND DISMISSING
ACTION WITH PREJUDICE TO THE
LABOR AND WORKFORCE
DEVELOPMENT AGENCY**

1 JEFFREY THOMAS STRAHL. on behalf
2 of the general public as private attorney
general,

3 Plaintiff,

4 v.

5 SFM, LLC, a California Limited Liability
6 Company; SF Markets, LLC, dba
SPROUTS FARMERS MARKET, a
Delaware Limited Liability Company; and
DOES 1-50, inclusive,

7 Defendants.
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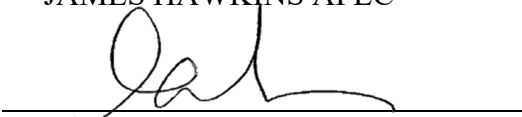
1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff hereby provides Proof of Service of Order Approving Settlement of Private Attorneys
3 General Act Claims, Dismissing Action with Prejudice to the Labor and Workforce Development
4 Agency. Attached hereto as Exhibit A is the Labor and Workforce Development Agency's
5 submission confirmation.
6

7 Respectfully submitted,

8
9 DATED: December 20, 2022

JAMES HAWKINS APLC

10 By: 

11 JAMES R. HAWKINS, ESQ.
12 GREGORY HAWKINS, ESQ.
13 MICHAEL CALVO, ESQ.

14 Attorneys for Plaintiffs WILLIAM GARCIA RAYA
15 JR., LAURIELLE CUTHBERTSON, and JEFFREY
16 THOMAS STRAHL, and the general public as
17 private attorney general
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EXHIBIT A



State of California
Labor and Workforce Development Agency /
Department of Industrial Relations

Private Attorneys General Act (PAGA) – Filing

Court Order or Judgment in PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX".

[Search for PAGA Case number](#)

Your Information (Person Who is Filing)

Your First Name *

Your Last Name *

Your Email Address *

Your Street Name, Number and Suite/Apt *

Your Mobile Phone Number

Your City *

Your Work Phone Number

Your State *

Your Zip/Postal Code *

Court Case Name and Plaintiff Information

Court Case Name

Plaintiff Name

Order or Judgment Details

Date Court order signed by Judge *

Gross settlement amount *

Gross penalties *

880,700.00

Penalties to LWDA *

660,525.00

Fee award *

500,000.00

Court Order.Judgment File and Other Files

Court Order or Judgment * 12.19.22 Ord...AGA Stlmt.pdf**Other Attachment** No file chosen[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ I understand that, if I file, I must comply with the redaction rules consistent with this notice.

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Attorneys for Defendant
SF MARKETS, LLC

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

WILLIAM GARCIA RAYA, JR. on
behalf of the general public as private
attorney general,

Plaintiff,

v.

SFM, LLC, a California Limited Liability
Company; SF Markets, LLC, dba
SPROUTS FARMERS MARKET, a
Delaware Limited Liability Company; and
DOES 1-50, inclusive,

Defendants.

LAURIELLE CUTHBERTSON, on
behalf of the general public as private
attorney general,

Plaintiff,

v.

FILED
Superior Court of California
County of Los Angeles
12/19/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: H. Garcia Deputy

Case No. 21STCV18228
Related to Case Nos. 21STCV43022 and
21STCV4015

Judge: David Sotelo
Dept: 40

**[PROPOSED] ORDER APPROVING
SETTLEMENT OF PRIVATE
ATTORNEYS GENERAL ACT CLAIMS,
DISMISSING ACTION WITH
PREJUDICE**

1 SFM, LLC, a California Limited Liability
2 Company; SF Markets, LLC, dba
3 SPROUTS FARMERS MARKET, a
4 Delaware Limited Liability Company; and
5 DOES 1-50, inclusive,

6 Defendants.

7 JEFFREY THOMAS STRAHL. on behalf
8 of the general public as private attorney
9 general,

10 Plaintiff,

11 v.

12 SFM, LLC, a California Limited Liability
13 Company; SF Markets, LLC, dba
14 SPROUTS FARMERS MARKET, a
15 Delaware Limited Liability Company; and
16 DOES 1-50, inclusive,

17 Defendants.

18 .

1 **ORDER**

2 The Court, having reviewed the Parties' the Private Attorneys General Act (Labor Code §
3 2698 *et seq.*) ("PAGA") Settlement Agreement (the "Settlement" or "Settlement Agreement")
4 attached as Exhibit "A" to the concurrently-filed Declaration of James Hawkins, together with the
5 Stipulation of the Parties and the Declaration of James Hawkins and exhibits attached thereto,
6 hereby ORDERS AS FOLLOWS:

7 Plaintiffs' Actions seek civil penalties on behalf of the State of California and similarly
8 situated aggrieved employees (the "Aggrieved Employees"), as authorized by PAGA under
9 Labor Code § 2699, in relation to alleged violations of the predicate statutes set forth in Plaintiffs'
10 Complaints and their respective letters to the Labor Workforce and Development Agency
11 "LWDA") (the "LWDA Letter"), on behalf of all current and former non-exempt employees of
12 Defendant SFM LLC from March 9, 2020 and the date that the Court enters an Order approving
13 the PAGA Settlement.

14 Under PAGA, in any action brought by an aggrieved employee, the Court "shall review and
15 approve any settlement of any civil action filed pursuant to this part." Lab. Code § 2699(1)(2).
16 Accordingly the Court, having considered the proposed settlement set forth in the Settlement
17 Agreement, including the proposed PAGA penalties, under Labor Code § 2699(1)(2), having
18 considered the papers filed in support of the proposed settlement and the arguments of counsel, and
19 good cause appearing, **NOW THEREFORE, IT IS ORDERED:**

20 1. The Court finds the instant Actions presents a good faith dispute of the claims alleged;

21 2. The Court finds in favor of settlement approval, and therefore approves the Settlement
22 of the above-captioned actions, as set forth in the Settlement Agreement and each of the releases and
23 other terms, as fair, just, reasonable, and adequate.;

24 3. The Court finds further that Plaintiffs, acting on behalf of themselves and the State of
25 California, by operation of this Order hereby releases and forever discharges Defendants and the
26 Released Parties (as defined in the Settlement Agreement) from any and all PAGA Released Claims
27 (as defined in the Settlement Agreement) including penalties asserted in Plaintiffs' respective
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1 Complaints, including any and all known and unknown claims for civil penalties under the Private
2 Attorneys General Act, California Labor Code §§ 2698, *et seq.*, that arise.

3 4. The Court finds further that the foregoing release shall be binding on Plaintiffs and the
4 State of California, and shall bar any claim under PAGA brought by any person, including the Aggrieved
5 Employees (defined as PAGA Group Members in the Settlement Agreement), on behalf of the State of
6 California, as to the PAGA Released Claims and Released Parties.

7 5. The Court finds further that for reasonable consideration, Plaintiffs have agreed to and is
8 bound by Plaintiffs' Complete and General Release (as defined in the Settlement Agreement) and waiver
9 of California Civil Code Section 1542;

10 6. The Parties are directed to comply with all terms of the Settlement Agreement, and
11 Defendants are directed to make all payments required by the Settlement Agreement;

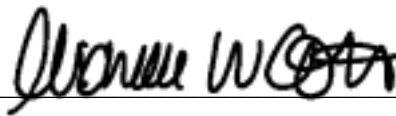
12 7. Under the Settlement Agreement, Defendant agrees to pay an all-in gross amount of One-
13 Million Five-hundred thousand dollars (\$1,500,000.00) (the "PAGA Settlement Amount"). The
14 PAGA Settlement Amount is inclusive of payments to the LWDA and Aggrieved Employees,
15 enhancement award to Plaintiff, Attorney's Fees and Costs, and Administration Costs. No portion of the
16 Gross Settlement Amount will revert to Defendant. Plaintiff's Counsel request an award of attorney's fees
17 of \$500,000.00 and costs of \$22,500; payment of settlement administrator ILYM Group administration
18 costs of (\$86,800), and \$5,000.00 each to Plaintiff Strahl and Plaintiff Cuthbertson as a service award and
19 individual settlement release. Defendant does not oppose these requests. The Court finds the PAGA
20 Settlement Amount is fair, reasonable and adequate, and approves each of these payments, and directs the
21 Settlement Administrator to make the above payments from the Gross Settlement Amount.

22 8. After deducting the foregoing payments, the estimated remainder of approximately
23 \$880,700 shall form the Net Settlement Amount ("NSA"). Pursuant to Labor Code section 2699(i), the
24 NSA will then be distributed 75% percent (\$660,525) to the LWDA, and the remaining 25% percent
25 (\$220,175) to the Aggrieved Employees on a pro rata basis, as set forth in the Settlement Agreement. The
26 Court approves these payments, and directs the Settlement Administrator to issue checks to the LWDA and
27 Aggrieved Employees, along with the Notice of PAGA Settlement, as set forth in the Settlement
28 Agreement, and to otherwise carry out its duties as set forth in the Settlement Agreement; and

1 9. The entire Actions entitled (1) *William Garcia Raya Jr., v. SFM LLC et al* Case No.
2 21STCV18228; (2) *Laurielle Cuthbertson, v. SFM LLC et al* Case No. 21STCV40150; and (3)
3 *Jeffrey Thomas Strahl Jr., v. SFM LLC et al.* Case No. 21STCV18228 are hereby DISMISSED
4 WITH PREJUDICE as to all parties and all causes of action in this Action. The Court reserves exclusive
5 and continuing jurisdiction over the Action and the Parties under Code of Civil Procedure § 664.6 for the
6 purpose of supervising implementation, enforcement, construction, administration, and interpretation of the
7 Settlement Agreement.

8 10. Plaintiffs shall promptly submit a copy of this Order to the LWDA pursuant to
9 PAGA.

10 **IT IS SO ORDERED.**

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13 HON. ~~DAVID SOTELO~~ Michelle Williams Court
14 SUPERIOR COURT JUDGE
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Thank you. If you provided an email address with your submission, a confirmation regarding your submission will be emailed to you. Otherwise, you can search for the case to verify that your submission was properly received.

[Click Here](#) to Search Case

From: [Greg Mauro](#)
To: [Alma Chavarin](#)
Subject: Fwd: Thank you for your Court Order or Judgment Submission
Date: Tuesday, December 20, 2022 7:50:34 AM

Gregory Mauro
JAMES HAWKINS, APLC
9880 Research Drive, Suite 200
Irvine, CA. 92618
Tel: 949-387-7200
greg@jameshawkinsaplc.com

Begin forwarded message:

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>
Date: December 19, 2022 at 2:44:22 PM PST
To: Greg Mauro <greg@jameshawkinsaplc.com>
Subject: Thank you for your Court Order or Judgment Submission

12/19/2022 02:44:10 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment
If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

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On December 20, 2022, I served on the interested parties in this action the following document(s) entitled:

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address Alma@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

CDL LABOR LAW LLP
Amy S. Williams, State Bar No. 228853
awilliams@cdllaborlaw.com
Ashley A. Halberda, State Bar No. 272762
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18300 Von Karman Avenue, Suite 800
Irvine, CA 92612
Telephone: (949) 622-1661
Attorneys for Defendant
SFM, LLC registered in California as
SF MARKETS, LLC and doing business as
Sprouts Farmers Market

Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Suite. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act>

Executed on December 20, 2022, at Irvine, California

PROOF OF SERVICE