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and Matthew Haddad

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

ROSS FELIX, individually and on behalf of
all other aggrieved employees, and the state
of California

Plaintiff,

v.

MEDVERSANT TECHNOLOGIES, LLC.,
MATTHEW HADDAD, an individual, and;
DOES 1-100 inclusive,

Defendants.

RELATED CROSS-COMPLAINT AND
CONSOLIDATED ACTION

FILED
Superior Court of California
County of Los Angeles

09/14/2026

David W. Slayton, Executive Officer / Clerk of Court

By: L. Garcia Deputy

Case No. 21GDCV00283 (Consolidated with
Case No. 21GDCV01190)

~~PROPOSED~~ ORDER APPROVING
PAGA SETTLEMENT

Complaint Filed: March 2, 2021
Judge: Frank M. Tavelman
Department: A
Trial Date: Vacated

~~PROPOSED~~ ORDER APPROVING PAGA SETTLEMENT

~~**PROPOSED**~~ **ORDER**

The Court has reviewed the Joint Stipulation submitted by ROSS FELIX (“Plaintiff” or “FELIX”) on behalf of all alleged “aggrieved employees” and Defendants MEDVERSANT TECHNOLOGIES, LLC. (“MEDVERSANT”) and MATTHEW HADDAD (“HADDAD,” and collectively, “Defendants”), who have settled the PAGA claims and now seek approval pursuant to the California Private Attorney General Act, as codified in Labor Code section 2699, et. seq., (“PAGA”).

FINDINGS:

The Court finds that a PAGA Settlement in the total sum of \$15,000 (Fifteen Thousand Dollars) is not “unjust, arbitrary and oppressive, or confiscatory”, as set forth in Labor Code section 2699 (e)(2), and therefore, approves this PAGA Settlement

IT IS HEREBY ORDERED THAT:

1. The Court hereby approves the PAGA Settlement as set forth in Exhibit 1 attached to Joint Stipulation filed concurrently with this Order and directs the Parties to effectuate the terms of the PAGA Settlement, including the following:
2. Defendants shall pay a total of \$15,000 as the “PAGA Settlement Payment”. Five Thousand Dollars (\$5,000) shall be paid for attorney fees and costs. The remaining Ten Thousand Dollars (\$10,000), referred to as the “Net PAGA Settlement” totaling \$10,000 in PAGA civil penalties will be paid as follows: A total of seventy-five percent (75%), or \$7,500, of the Net PAGA Settlement shall be paid to the Labor and Workforce Development Agency (“LWDA”). The remaining twenty-five percent (25%), or \$2,500, of the Net PAGA Settlement shall be payable to the PAGA Settlement Group Members as set forth in the PAGA Settlement, the pertinent details of which are as follows:
3. Payment of the \$10,000 (Ten Thousand Dollars) Net PAGA Settlement Sum shall be made within ten (10) business days of the date of entry of this Order (“Effective Date”) as follows:

- 1 4. Defendants and/or their counsel shall deliver to the Law Offices of Thomas M.
2 Diachenko, APC” at 1916 3rd Avenue, San Diego, CA, 92101 a check made
3 payable to the LWDA as and for the LWDA Penalty Payment, in the amount
4 calculated pursuant to the terms of this Agreement (\$7,500) which Plaintiff’s
5 Counsel will send to the LWDA with an enclosure letter copying Defense
6 Counsel on same.
- 7 5. Defendants shall deliver directly to the three (3) non-party PAGA Settlement
8 Group Members equal shares of the PAGA penalty payments in the amount of
9 \$500 apiece directly to the individual employees to the last known physical
10 address on file with Defendants in its regularly maintained records for all other
11 Aggrieved Employees, except for FELIX and GUPTA. Should the checks go
12 undelivered, Defendants shall undertake all reasonable efforts to locate said
13 individuals and attempt delivery again. Should all efforts fail, Defendants
14 and/or their counsel shall send those funds to the LWDA with a properly
15 addressed enclosure letter (as specified in the attachment to Exhibit 1) copying
16 Plaintiff’s Counsel.
- 17 6. Defendants shall deliver PAGA settlement checks/payments of \$500 apiece for
18 FELIX and GUPTA certified/registered mail to Plaintiff’s Counsel at 1916
19 Third Avenue, San Diego, CA 92101.
- 20 7. Payment of \$5,000 (Five Thousand Dollars) of the PAGA Settlement Sum shall
21 be made on the last day of the month following the first set of payments
22 (totaling \$10,000) described above, as follows: Defendants shall also deliver a
23 check for \$5,000 made payable to the “Law Offices of Thomas Diachenko,
24 APC” delivered via certified/registered mail to Plaintiff’s Counsel at 1916
25 Third Avenue, San Diego, CA 92101.
- 26 8. The Court shall maintain jurisdiction over this matter until the Parties, through their
27 respective counsel file a stipulation with the Court verifying compliance and set a
28

1 PAGA Settlement Compliance Hearing Date at least 60 days after the Court enters
2 an Order approving the PAGA Settlement.

- 3 9. The Court orders the Parties to appear at a compliance hearing on 11/19/26,
4 2026, at 9:00AM am/pm.

5 **IT IS SO ORDERED.**

6 DATE: 09/14/2026


7 Hon. Frank M. Tavelman
8 Judge of the Superior Court