

KINGSLEY SZAMET & LY

ERIC B. KINGSLEY, Esq. (SBN 185123)

eric@kingsleylawyers.com

KELSEY M. SZAMET, Esq. (SBN 260264)

kelsey@kingsleylawyers.com

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Telephone: (818) 990-8300

Fax: (818) 990-2903

Attorneys for Plaintiff and the aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

CRISTINA GUZMAN, an individual, on
behalf of herself and others similarly situated,

PLAINTIFF,

v.

RANDSTAD US, LLC; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 21CV380800

[Case Assigned for All Purposes to Hon.
Theodore C. Zayner in Dept. 19]

**~~PROPOSED~~ AMENDED ORDER
GRANTING APPROVAL OF
REPRESENTATIVE ACTION
SETTLEMENT**

Date: October 23, 2024

Time: 1:30 PM

Dept.: 19

Complaint Filed: April 28, 2021

Trial Date: None Set

1 **~~PROPOSED~~ AMENDED ORDER**

2 The Motion for Approval of Representative Action Settlement (“Motion”) came before this
3 Court, the Honorable Theodore C. Zayner, presiding. The Court, having considered the papers
4 submitted in support of the motion of the parties, **HEREBY ORDERS THE FOLLOWING:**

5 Having considered Plaintiff’s Motion, and all legal authorities and documents submitted
6 in support thereof, including the PAGA Settlement Agreement (“Agreement”) attached to the
7 Szamet Declaration as Exhibit “1”, and good cause appearing, IT IS HEREBY ORDERED that
8 Plaintiff’s Motion is GRANTED, subject to the following findings and orders:

- 9 1. The Court finds the Settlement Agreement is fair and reasonable.
- 10 2. The Court approves the Gross Settlement Amount of \$140,000.00.¹
- 11 3. The Court approves the PAGA Penalties in the amount of \$113,902.86.
- 12 4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in
13 the amount of \$85,427.15.
- 14 5. The Court directs that the remaining 25% of the PAGA Penalties, in the amount
15 of \$28,475.71 shall be allocated to the aggrieved employees.
- 16 6. The Court approves the PAGA Counsel’s Litigation Expenses Payment of
17 \$12,247.14.
- 18 7. The Court approves Plaintiff’s Enhancement Payment of \$5,000.00 to Plaintiff
19 CRISTINA GUZMAN.
- 20 8. The Parties are ordered to carry out the terms of the Agreement.
- 21 9. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction
22 over this action and the Parties and the PAGA Members including after the entry
23 of this Order, to the fullest extent necessary to interpret, enforce and effectuate
24 the terms and intent of the Settlement Agreement and this Order.

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¹ Unless otherwise defined herein, all capitalized terms shall have the meaning assigned to them in the Agreement.

1 **DATED:** October 24, 2024



JUDGE OF THE SUPERIOR COURT

Michelle Tanzer

From: DIR PAGA Unit <no-reply@formassembly.com>
Sent: Thursday, October 24, 2024 9:56 AM
To: Michelle Tanzer
Subject: Thank you for your Proposed Settlement Submission

External Email!

10/24/2024 09:55:37 AM

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

Item submitted: Proposed Settlement

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](http://labor.ca.gov/Private_Attorneys_General_Act.htm)



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

Private Attorneys General Act (PAGA) – Filing

Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the numbers after "LWDA-CM-" in the following format, "XXXXXXXXXX-XX".

[Search for PAGA Case number](#)

The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.

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 and Hearing Information

Court *

Santa Clara

Court Case Number *

21CV380800

Hearing Date (if any)

October 23, 2024

Hearing Time

1:30 pm

Hearing Location

Dept. 19

Number of aggrieved employees *

981

Gross settlement amount *

140,000.00

Gross penalty amount *

113,902.86

Penalties to LWDA *

85,427.15

Date of proposed settlement *

04/30/2024

Proposed Settlement and Other Documents

Proposed Settlement *

 PAO Granting PAGA Mtn.pdf

Other Attachment (if any)

 Proposed Fina...ee Motion.pdf

Other Attachment (if any)

 Proposed Am... Judgment.pdf[Remove](#)[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGAInfo@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.

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 24, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] AMENDED ORDER GRANTING FINAL APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Elizabeth J. MacGregor
emacgregor@seyfarth.com
SEYFARTH SHAW LLP
560 Mission Street, 31st Floor
San Francisco, California 94105

Daniel C. Whang
dwhang@seyfarth.com
SEYFARTH SHAW LLP
2029 Century Park East, Suite 3500
Los Angeles, California 90067

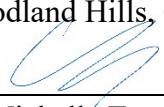
SEYFARTH SHAW LLP
Jeffrey A. Nordlander
jnordlander@seyfarth.com
400 Capitol Mall, Ste 2350
Sacramento, CA 95814-4428

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 24, 2024, at Woodland Hills, California.



Michelle Tanzer