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

12 ROBERT NUGENT, as an individual and on
behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 PAYSAFE PAYMENT PROCESSING
16 SOLUTIONS LLC, a Delaware limited
liability company; and DOES 1 through 50,
17 inclusive,
Defendants.

CASE NO. 21STCV25245

[Assigned for all purposes to the Hon. Elihu M. Berle,
Dept. 6]

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20 **[PROPOSED] ORDER OF APPROVAL**
21 **AND FINAL JUDGMENT**

22 The Court has received and considered the Approval Motion filed by Plaintiff, as an individual,
23 and on behalf of the people of the State of California and as an “aggrieved employee” acting as a private
24 attorney general under the Labor Code Private Attorneys General Act of 2004, § 2699, *et seq.*
25 (“PAGA”) in the above captioned action filed on July 9, 2021.

26 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

27 The Court hereby approves the Parties’ proposed PAGA Settlement and hereby enters FINAL
28 JUDGMENT in favor of Plaintiff and the Aggrieved Employees in the amount of \$30,000. Of this,
\$12,535.25 is awarded as attorney fees and costs paid to PAGA Counsel, \$2,500.00 is awarded as

FILED
Superior Court of California
County of Los Angeles

03/24/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: M. Fregoso Deputy

Plaintiff's Service Award, and \$2,750.00 is awarded as administrative costs paid to the claims administrator.

Defendant shall fund the settlement within 15 calendar days of the Effective Date of the Settlement. Upon funding of the \$30,000.00 Settlement Amount by Defendants and mailing of the PAGA Payments by the claims administrator, the PAGA Group Members fully, forever, irrevocably, and unconditionally release and discharge Paysafe Payment Processing Solutions LLC, as well as its predecessors, successors, parents, affiliated and subsidiary corporations (including Lenders Merchant Services, LLC), limited liability companies, limited partnerships, general partnerships and limited liability partnerships, present or past officers, directors, employees, partners, members, managers, representatives, principals, insurers, co-insurers, re-insurers, shareholders, agents, assigns, and attorneys (collectively referred to hereinafter as the "Released Parties"), from all PAGA claims/recovery based on alleged violations of sections 201-204, 226, 233, 246, and 2698 the Labor Code, within the PAGA Periods, and all potential claims reasonably arising out of the facts alleged in Plaintiff's Complaint and/or PAGA Notice. The Released Claims shall exclude claims for unemployment insurance, disability, and workers' compensation, and claims outside of the PAGA Period. Further, Released Claims in this Settlement Agreement shall not release any non-PAGA class claims or release any individual claims other than Plaintiff's individual released claims

This Judgment is entered as part of a Settlement and the Court has made no findings of liability or provided any notice of PAGA violations.

This Court further orders that the First, Second and Fourth Causes of Action be dismissed without prejudice as to all putative class members and with prejudice as to Plaintiff as an individual.

This Judgment is intended to be a final disposition in its entirety of the above captioned action.

IT IS SO ORDERED.

Dated: 3-24, 2022



Elihu M. Berle

Hon. Elihu M. Berle
Judge of the Superior Court
Elihu M. Berle / Judge

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