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Attorneys for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MANNY HANECH ZIPERMAN, an
individual, on behalf of the State of
California, as a private attorney general,

PLAINTIFF,

v.

PARKWAY MOTORCARS VALENCIA
INC. DBA PARKWAY BUICK GMC
CADILLAC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

Case No. 21STCV31959

[Case Assigned for All Purposes to Hon. Holly
J. Fujie in Dept. 56]

**[PROPOSED] ORDER GRANTING
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

*[Filed concurrently with Declarations of Kelsey
M. Szamet, Jonathan Paul of Xpand Legal, and
Plaintiff Manny Hanech Ziperman in Support of
Plaintiff's Motion for Approval of
Representative Action Settlement]*

Date: March 7, 2024

Time: 8.30a.m.

Dept.: 56

Reservation Number: 456564842760

Complaint Filed: August 30, 2021

Trial Date: None Set

1 **[PROPOSED] ORDER**

2 The Motion for Approval of Representative Action Settlement (“Motion”) came before this
3 Court, the Honorable Holly J. Fujie, presiding. The Court, having considered the papers submitted
4 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 PAGA Settlement Agreement (“Agreement” or “Settlement”),
7 attached to the Kingsley Declaration as Exhibit “1”, and good cause appearing, IT IS HEREBY
8 ORDERED that Plaintiff’s Motion is GRANTED, subject to the following findings and orders:

- 9 1. The Court finds the Settlement is fair and reasonable.
- 10 2. The Court approves the Gross Settlement Amount of \$160,000.00
- 11 3. The Court approves the PAGA Penalties in the amount of \$ 84,711.72.
- 12 4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in
13 the amount of \$63,533.79.
- 14 5. The Court directs that the remaining 25% of the PAGA Penalties, in the amount
15 of \$21,177.93 shall be allocated to the Aggrieved Employees.
- 16 6. The court approves the PAGA Counsel’s request for reimbursement of case costs
17 in the amount of \$10,454.95.
- 18 7. The Court approves the settlement administration costs of \$6,500.00.
- 19 8. The Court approves an enhancement payment to Plaintiff Manny Hanech
20 Ziperman of \$5,000.00.
- 21 9. The Parties are ordered to carry out the terms of the Agreement.
- 22 10. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction
23 over this action and the Parties and the Aggrieved Employees including after the
24 entry of this Order, to the fullest extent necessary to interpret, enforce and
25 effectuate the terms and intent of the Agreement and this Order.
- 26
- 27
- 28

DATED: _____

JUDGE OF THE SUPERIOR COURT

(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 February 13, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER GRANTING APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Robert W. Thompson
rthompson@ctsclaw.com

Alex A. Zolg
azolg@ctsclaw.com

**CALLAHAN, THOMPSON, SHERMAN
& CAUDILL LLP**

2601 Main Street, Suite 800
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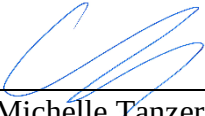
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic 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 February 13, 2024, at Encino, California.



Michelle Tanzer