

Carolyn H. Cottrell (SBN 166977)
Ori Edelstein (SBN 268145)
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
ccottrell@schneiderwallace.com
oedelstein@schneiderwallace.com

*Attorneys for Plaintiffs, on behalf of the
State of California and Aggrieved Employees*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

JENNIFER BURSACK, MICHELLE MANESSE,
NATASHA GILMAN, CURTIS ALLEN,
JOSHUA PAVELKO, CONSTANCE GORMAN,
MELINDA GUERRERO, KENNETH CHUNG,
LISA FLOWER, EDWARD LIU, MARVIN
MENEFEE, HEATHER RANDRUP, JUNG SEO,
JASON SHUMSKI, JENNIFER TALLEY,
JENNIFER VENEGAS, FRANK VASQUEZ,
ROBERT RODRIGUEZ, LAURA BRIGHT,
RYAN LEONARDO, KARYN STEVENS, and
LUIS ROSSI, each as an individual and on behalf
of all other aggrieved employees,

Plaintiffs,

v.

LOANDEPOT.COM, LLC, a Delaware
corporation; and DOES 1-50, inclusive,

Defendant.

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

JAN 30 2025

DAVID H. YAMASAKI, Clerk of the Court

BY: CAH, DEPUTY

Honorable William Claster
Department CX101

Case No.: 30-2022-01298792-CU-OE-CXC

**AMENDED [PROPOSED] ORDER
GRANTING PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENTS**

Date: January 24, 2025

Time: 9:00 AM

Location: CX101

Reservation No. 74396016

Action Filed: December 23, 2022

1st Amended Complaint: December 30, 2022

2nd Amended Complaint: April 21, 2023

3rd Amended Complaint: December 28, 2023

4th Amended Complaint: September 24, 2024

Trial Date: None Set

PROPOSED ORDER

The Motion of Plaintiffs Jennifer Bursack, Michelle Manesse, Natasha Gilman, Curtis Allen (a/k/a Allen Curtis), Joshua Pavelko, Constance Gorman, Melinda Guerrero, Kenneth Chung, Lisa Flower, Edward Liu, Marvin Menefee, Heather Randrup, Jung Seo, Jason Shumski, Jennifer Talley, Jennifer Venegas, Frank Vasquez, Robert Rodriguez, Laura Bright, Ryan Leonardo, Karyn Stevens, and Luis Rossi for an order approving the PAGA Settlement of the above-captioned action and entering judgment thereon ("Motion"), having come before the Court, the Court being duly apprised of the premises, and good cause appearing,

IT IS HEREBY ORDERED that the Motion shall be and hereby is **GRANTED** and the PAGA Representative Settlement of this action is hereby **APPROVED**, and

IT IS FURTHER ORDERED as follows:

1. Capitalized terms in this Order shall have the same meaning they are given in the Settlement and Release ("Settlement") attached as **Exhibit 1** to the Declaration of Carolyn H. Cottrell ("Cottrell Decl.") filed in support of the Motion;

2. Phoenix Settlement Administrators ("Phoenix") is approved to serve as the Claims Administrator and is hereby authorized to perform all of the duties assigned to it in the Settlement and to disburse the following from the Settlement Payment in accordance with the terms of the PAGA Representative Settlement:

- A. The LWDA Settlement Proceeds in the amount of \$703,406.25;
- B. The Aggrieved Employees' portion of the PAGA Penalties in the aggregate amount of \$234,468.75;
- C. Plaintiffs' counsel's attorneys' fees in the amount of \$435,300.00;
- D. Plaintiffs' counsel's litigation costs in the amount of \$38,325.00 shall be distributed as follows:
 - i. Schneider Wallace Cottrell Konecky LLP shall receive \$15,671.46;
 - ii. W Employment Law shall receive \$1,642.95; and
 - iii. Haig B. Kazandjian Lawyers, APC shall receive \$21,010.59.
- E. Plaintiff Rossi's enhancement payment in the amount of \$10,000.00;

1 F. Mena Mansour's, Christine Gomez Zagorski's, and Mercurious (a/k/a
2 Mercurios) Hanna's enhancement payments in the amount of \$5,000.00 each;
3 and

4 G. The Claims Administrator's costs in the amount of \$14,500.00.

5 3. The State of California and all Aggrieved Employees (including Plaintiffs) are hereby
6 deemed to have, and by operation of this Order and Judgment shall have, expressly released, waived,
7 and discharged Defendant and the Releasees from the released claims, as set forth in the Settlement,
8 and they shall be bound by this Order and Judgment and be forever barred from suing Defendant or
9 any of the Releasees on any of the released claims.

10 4. Judgment shall be entered forthwith in accordance with the foregoing, with each side
11 to pay its own attorneys' fees and costs except as expressly set forth in the Settlement.

12 5. Furthermore, **IT IS HEREBY ORDERED** that the *Hernandez's* Settlements are
13 hereby **APPROVED**, and

14 **IT IS FURTHER ORDERED** as follows:

15 6. The LWDA Settlement Proceeds in the amount of \$591.26 from Jennifer Bursack's
16 Individual PAGA Settlement Agreement;

17 7. The LWDA Settlement Proceeds in the amount of \$215.70 from Michelle Manesse's
18 Individual PAGA Settlement Agreement;

19 8. The LWDA Settlement Proceeds in the amount of \$340.57 from Curtis Allen's
20 Individual PAGA Settlement Agreement;

21 9. The LWDA Settlement Proceeds in the amount of \$272.90 from Joshua Pavelko's
22 Individual PAGA Settlement Agreement;

23 10. The LWDA Settlement Proceeds in the amount of \$648.73 from Constance Gorman's
24 Individual PAGA Settlement Agreement;

25 11. The LWDA Settlement Proceeds in the amount of \$968.09 from Kenneth Chung's
26 Individual PAGA Settlement Agreement;

27 12. The LWDA Settlement Proceeds in the amount of \$1,637.23 from Heather Randrup's
28 Individual PAGA Settlement Agreement;

1 13. The LWDA Settlement Proceeds in the amount of \$1,114.06 from Jung Seo's
2 Individual PAGA Settlement Agreement;

3 14. The LWDA Settlement Proceeds in the amount of \$855.04 from Jennifer Venegas's
4 Individual PAGA Settlement Agreement;

5 15. The LWDA Settlement Proceeds in the amount of 2,200.83 from Frank Vasquez's
6 Individual PAGA Settlement Agreement;

7 16. The LWDA Settlement Proceeds in the amount of \$702.64 from Robert Rodriguez's
8 Individual PAGA Settlement Agreement;

9 17. The LWDA Settlement Proceeds in the amount of \$1,474.25 from Laura Bright's
10 Individual PAGA Settlement Agreement; and

11 18. The LWDA Settlement Proceeds in the amount of \$3,454.98 from Ryan Leonardo's
12 Individual PAGA Settlement Agreement.

13 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

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15 Dated: 1-30-25

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18 _____
19 Hon. William Claster
20 Superior Court Judge
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PROOF OF SERVICE

I, Rocio D. Espinoza, declare the following:

I am over the age of eighteen years and not a party to the within entitled action. I am employed at Schneider Wallace Cottrell Konecky LLP located at 2000 Powell Street, Suite 1400, Emeryville, California 94608.

On January 29, 2025, I served the following document(s) described as:

1. AMENDED [PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR APPROVAL OF PAGA SETTLEMENTS

on the following interested party(s):

Jacqueline Beaumont
Julie Trotter
Michael Y. Lu
Denise Reigel, Assistant
Carrie Daly, Assistant
Katie Dominick
CALL & JENSEN
CA SBN 209675
610 Newport Center Drive, Suite 700
Newport Beach CA 92660
(949) 717-3000

jbeaumont@calljensen.com
jtrotter@calljensen.com
mlu@calljensen.com
cdaly@calljensen.com
dreigel@calljensen.com
kdominick@calljensen.com
Attorney for Defendant

Haig Kazandjian, Esq.
David Van Pelt, Esq.
Cathy Gonzalez, Esq.
Osbaldo Bautista
Haig B. Kazandjian Lawyers, APC
801 N. Brand Blvd., Suite 970
Glendale, CA 91203
Phone: 818-696-2306
Fax: 818-696-2307

haig@hbklawyers.com
david@hbklawyers.com
osbaldo@hbklawyers.com
cathy@hbklawyers.com

*Attorneys for Plaintiffs Mansour, Zagorski,
Chavez, and Hanna*

☒ **BY ELECTRONIC SERVICE** by electronically mailing a true and correct copy in PDF format through SWCKW's electronic mail system to the email address(s) set forth above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 29, 2025, at Petaluma, California.



Rocio D. Espinoza