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7 Attorneys for Plaintiff Tarik Bob, on behalf of himself and all "aggrieved employees" pursuant to
8 Labor Code § 2698 *et seq.*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF MERCED**

11 TARIK BOB, on behalf of himself and all
12 "aggrieved employees" pursuant to Labor
13 Code § 2698 *et seq.*,

14 Plaintiff,

15 vs.

16 COMPASS CALIFORNIA, INC. a
17 Delaware corporation, and DOES 1
through 10, inclusive,

18 Defendants.

CASE No. 22CV-01472

*Assigned for All Purposes to the Honorable
Brian McCabe, Dept. 8*

UNLIMITED JURISDICTION

**STIPULATION AND [PROPOSED] ORDER
APPROVING SETTLEMENT OF CLAIMS
AND DISMISSING ACTION WITH
PREJUDICE**

Complaint Filed: May 24, 2022

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1 6. Whereas, the parties request that the Court enter the accompanying order, approving
2 their Settlement Agreement and Release (attached to the Parties concurrently-filed Stipulation To
3 File Settlement Under Seal), as permitted by Labor Code § 2699(l), and dismissing the Action with
4 prejudice.

5 **IT IS SO STIPULATED.**

6 For Plaintiff:
7 GAINES & GAINES, APLC

For Defendant:
HOPKINS & CARLEY

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9 By: Daniel F. Gaines
10 Daniel F. Gaines, Esq.

By: Daniel F. Pyne
Daniel F. Pyne III

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1. The Court finds the Settlement Agreement and Release was entered into in good faith, that the settlement is fair, reasonable, and adequate, and that the settlement satisfies the standards and applicable requirements for approval of PAGA representative actions under California law.

3. The Court approves and confirms the release and waiver of claims and rights under PAGA as to Plaintiff, all Aggrieved Employees, and the LWDA, as provided for in the Settlement Agreement and Release.

5. This Action is hereby DISMISSED WITH PREJUDICE.

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6. This Court shall retain jurisdiction, pursuant to Code of Civil Procedure section 664.6 and as otherwise provided by law, with respect to all matters related to the administration and consummation of the Settlement Agreement and Release, and any and all claims asserted in, arising out of, or related to the subject matter of the lawsuit, including but not limited to all matters related to the settlement and the determination of all controversies relating thereto.

IT IS SO ORDERED.

Dated: _____

JUDGE OF THE SUPERIOR COURT

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PROOF OF SERVICE AND CERTIFICATION

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action; my business address is 4550 East Thousand Oaks Boulevard, Suite 100, Westlake Village, CA 91362.

____ (For messenger) my business address is:

On June 15, 2022, I served the foregoing document described **STIPULATION AND PROPOSED ORDER APPROVING SETTLEMENT OF CLAIMS DISMISSING ACTION WITH PREJUDICE** on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Daniel F. Pyne, Esq. HOPKINS & CARLEY, ALC. 70 S. First Street San Jose, CA 95113	Joseph Tojarieh, Esq. TOJARIEH LAW FIRM, PC 10250 Constellation Blvd., Suite 100 Los Angeles, CA 90067 jft@tojariehlaw.com via e-mail only
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____ (BY ☐ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more that one day after date of deposit for mailing in affidavit.

____ (BY FEDERAL EXPRESS OR OTHER OVERNIGHT SERVICE) I deposited the sealed envelope in a box or other facility regularly maintained by the express service carrier or delivered the sealed envelope to an authorized carrier or driver authorized by the express carrier to receive documents.

____ (BY FACSIMILE TRANSMISSION) On _____, at _____, at Westlake Village, California, I served the above-referenced document on the above-stated addressee by facsimile transmission pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was (818)703-8984 and the telephone number(s) of the receiving facsimile machine was (916) 920-4402. A transmission report was properly issued by the sending facsimile machine, and the transmission was reported as complete and without error. Copies of the facsimile transmission cover sheet and the transmission report are attached to this proof of service.

____ (BY PERSONAL DELIVERY) By causing a true copy of the within document(s) to be personally hand-delivered to the office(s) of the addressee(s) set forth above, on the date set forth above.

 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission via email on the counsel of record listed above.

I certify that the above document was printed on recycled paper.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2022, at Westlake Village, California.



JEREMY REYES