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11 employees

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE

14 SILVIA LEMUS, individually and on
15 behalf of all other aggrieved employees,

16 Plaintiffs,

17 v.

18 TARNIK, INC., dba PDA GROUP, an
19 active California Corporation; REAL
20 TIME STAFFING SERVICES, LLC aka
21 SELECT STAFFING, an active
22 California Limited Liability Company;
23 EMPLOYBRIDGE, LLC, an active
24 California Limited Liability; and DOES 1
25 through 10,

26 Defendants.

Case No.: 21STCV40242

REPRESENTATIVE ACTION

*[Assigned to Hon. Lynne M. Hobbs
in Dept. 61]*

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
AND PAYMENT OF ATTORNEYS'
FEES AND COSTS, ADMINISTRATION
COSTS, AND ENHANCEMENT AWARD**

Date: March 17, 2025

Time: 10:00 a.m.

Dept.: 61

Hearing Reservation No.: 975706079992

22 On March 17, 2025, the Court considered the Motion of Plaintiff Silvia Lemus for
23 approval of the Parties' proposed Private Attorneys General Act ("PAGA") Settlement, and
24 Payment of Attorneys' Fees and Costs, Administration Costs, and Enhancement Award.

25 The Court having read and considered the papers on the motion submitted by
26 Plaintiff's Counsel, having heard the presentation of Plaintiff's Counsel and Defendants'
27 counsel, having reviewed all of the submissions presented with respect to the proposed

28 **[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT**

1 Settlement, and having determined that the Settlement is fair, adequate, and reasonable, it is
2 hereby ORDERED ADJUDGED, and DECREED that:

3 1. The Settlement, as set forth in the Parties' Parties' Joint Stipulation of
4 Settlement and Release of PAGA Action ("Settlement Agreement"), is in all respects fair,
5 reasonable, and it is approved pursuant to Cal. Lab. Code §2699. Except as expressly set forth
6 herein, the Parties shall effectuate the Settlement Agreement according to its terms. The
7 Settlement Agreement, and every term and provision thereof, shall be deemed incorporated
8 herein as if explicitly set forth and shall have full force of an Order of this Court;

9 2. Pursuant to PAGA, Cal. Lab. Code §§ 2699(1)(2), (1)(4), the Labor Workforce
10 and Development Agency ("LWDA") has been given notice of the Settlement. In particular,
11 on or about the date Plaintiff filed the Motion seeking approval of the Settlement with the
12 Court, Plaintiff submitted the Motion and all supporting documents to the LWDA online as
13 reflected by the Proof of Service filed concurrently with the Motion;

14 3. Aggrieved Employees are defined as: all current and former non-exempt
15 employees of Real Time Staffing Services, LLC dba Select Staffing who were placed on
16 assignment at PDA in California during the period from August 25, 2020 to April 21, 2024
17 ("PAGA Period");

18 4. Distribution of the PAGA Settlement Sum of \$100,000.00, is approved in
19 accordance with the Settlement Agreement and on account of disputed and alleged civil
20 penalties, as follows: (a) payment of \$40,000.00 in attorneys' fees to Plaintiff's Counsel,
21 Mooradian Law, APC; (b) payment of \$3,926.97 in attorneys' costs to Plaintiff's Counsel; (c)
22 payment to CPT Group, Inc., the selected administrator, for administration expenses totaling
23 \$6,000.00; (d) payment to Plaintiff Silvia Lemus totaling \$10,000.00 as an enhancement
24 award and for providing a general release; (e) payment to the Labor and Workforce
25 Development Agency ("LWDA") totaling \$30,054.78, which amount represents 75% of the
26 total PAGA Settlement Sum after attorneys' fees and costs, administration costs, and
27 enhancement award; and (f) payment of \$10,018.25, which amount represents 25% of the

1 total PAGA Settlement Sum after attorneys' fees and costs, administration costs, and
2 enhancement award, on a pro-rata basis to all Aggrieved Employees;

3 5. The Notice of PAGA Settlement and Release of Claims is approved and shall
4 be disseminated to Aggrieved Employees in accordance with the Settlement Agreement, in
5 English and Spanish;

6 6. Plaintiff is directed to submit a copy of this Order to the LWDA within 10 days
7 of the date of this Order;

8 7. The Court retains exclusive and continuing jurisdiction over this Action for the
9 purposes of supervising, administering, implementing, interpreting, and enforcing this Order,
10 as well as the Settlement.

11
12
13 Dated: _____

By: _____

Honorable Lynne M. Hobbs
Judge of the Superior Court