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20 REVOLT MEDIA AND TV, LLC;

21 LIFE AFTER DEATH MULTIMEDIA PRODUCTIONS, LLC; and DAVE SEEDALL

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
23 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

24 LENA KHOURY, individually, and on
25 behalf of herself and others similarly
26 situated,

27 Plaintiff,

28 v.

29 REVOLT MEDIA AND TV, LLC;
30 LIFE AFTER DEATH MULTIMEDIA
31 PRODUCTIONS LLC;
32 DAVE SEEDALL, an individual; and
33 DOES 1 THROUGH 100, inclusive,

34 Defendants.

CASE NO.: 21STCV33682

[Assigned for all purposes to the
Hon. Wendy Chang, Dept. 36]

**~~PROPOSED~~ ORDER RE JOINT
MOTION FOR APPROVAL OF
SETTLEMENT OF CIVIL PENALTIES
PURSUANT TO PAGA**

Complaint Filed: September 13, 2021

Reservation Number: 559573774656

Date: October 27, 2022

Time: 8:30 a.m.

Dept.: 36

FILED
Superior Court of California
County of Los Angeles

12/01/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: A. Rodriguez Deputy

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

The Court, having considered the Joint Motion for Approval of Settlement of Civil Penalties Pursuant to Private Attorneys General Act (Cal. Lab. Code § 2698, *et seq.*), and the pleadings and other records on file with the Court in this matter, and good cause appearing therefore, hereby ORDERS as follows:

1. The Court hereby GRANTS the Joint Motion for Approval of Settlement of Civil Penalties Pursuant to Private Attorneys General Act (Cal. Lab. Code § 2698, *et seq.*);

2. Judgment in this matter is entered in accordance with the terms of the Parties' PAGA Settlement Agreement (the "Settlement");

3. Pursuant to the Private Attorneys General Act of 2004 ("PAGA") and Labor Code section 2699(1)(2) in particular, the Court approves the Settlement and Gross PAGA Settlement Amount of \$60,000 and finds that it is fair and reasonable and furthers PAGA's objectives. The Court finds that the PAGA settlement has been reached as a result of informed and non-collusive arm's-length negotiations. The Court further finds that the Parties have conducted extensive investigation and research, and their attorneys were able to reasonably evaluate their respective positions.

4. The Gross PAGA Settlement Amount of \$60,000, less administration costs is approved;

5. That 75% of the Gross PAGA Settlement Amount, less administration costs, is approved for civil penalties to the LWDA;

6. That the remaining 25% in PAGA Penalties be paid to the Aggrieved Employees as alleged in the operative Complaint in this action;

7. The Settlement Agreement is hereby deemed incorporated herein as if expressly set forth, and has the full force and effect of an Order of this Court. The Settlement Agreement shall be enforced according to its terms;

IS HR RN NQCDQDC-

C@SD901.0.1/ 11



A handwritten signature in black ink, appearing to read "Wendy Chang", is written over the judge's name.

Wendy Chang / Judge

AA

1 **IT IS FURTHER ORDERED THAT:**

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7 **IT IS SO ORDERED.**

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11 DATED: _____

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13 HONORABLE WENDY CHANG
14 Judge of the Superior Court
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