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Attorneys for Plaintiff CECILIA MATA,
on behalf of herself, the LWDA, and all other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES-CENTRAL DISTRICT

CECILIA MATA, on behalf of herself and all
other aggrieved employees,

PLAINTIFF,

vs.

DISGUISE, INC., a California corporation;
JAKKS SALES LLC, a limited liability
company; JAKKS PACIFIC, INC., a
California corporation; and DOES 1 through
10, inclusive,

DEFENDANTS.

Case No. 21STCV47518

[Assigned to the Hon. Armen Tamzarian, Dept.
52]

**~~PROPOSED~~ ORDER APPROVING
PAGA SETTLEMENT AND JUDGMENT**

Date: March 18, 2022
Time: 9:00 a.m.

Complaint Filed: December 30, 2021

Reservation ID: 943130277883

1 Plaintiff and Defendants jointly moved for approval of the proposed settlement of
2 Plaintiff's claims for civil penalties under the California Labor Code Private Attorneys General
3 Act ("PAGA"), pursuant to California Labor Code section 2699(l). The parties seek approval of
4 the settlement, including the Gross Settlement Amount ("GSA") of \$105,000.00. The Settlement
5 Agreement provides that a PAGA Penalty Fund of \$60,497.86 shall be paid from the \$105,000.00
6 GSA. The Settlement Agreement also provides that (1) \$35,000.00 be paid to Plaintiff's Counsel
7 for payment of attorneys' fees; (3) \$1,502.14 be paid to Plaintiff's Counsel for actual litigation
8 costs incurred; (4) \$5,000.00 be paid to Plaintiff as her Service Award; and (5) \$3,000.00 be paid
9 to CPT Group, Inc. for the cost of administration of the settlement. The Labor Workforce
10 Development Agency was provided with notice of the settlement and the motion via its online
11 process and no objection has been received to the settlement or the motion.

12 Good cause appearing based on the reasons set forth in the motion for approval, the Court
13 hereby GRANTS the motion and approves the PAGA settlement as set forth in the Settlement
14 Agreement and the PAGA Penalty Fund of \$60,497.86, which shall be allocated and paid out as
15 set forth in the Settlement and in accordance with Labor Code section 2699(i).

16 After entry of this Judgment, the Court shall retain jurisdiction to construe, interpret,
17 implement, and enforce the Settlement Agreement, to hear and resolve any contested challenge to
18 a claim for settlement benefits, and to supervise and adjudicate any dispute arising from or in
19 connection with the distribution of settlement benefits.

20 **IT IS SO ORDERED AND ADJUDGED, LET JUDGMENT BE FORTHWITH**
21 **ENTERED ACCORDINGLY.**

22 DATED: 03/18/2022



23 
24 HON. ARMEN TAMZARIAN
25 LOS ANGELES SUPERIOR COURT JUDGE

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On February 1, 2022, I served the following document(s): on the following person or persons:
PROPOSED ORDER APPROVING PAGA SETTLEMENT

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☒ **BY ELECTRONIC TRANSMISSION.** Based on an agreement of the parties to accept service by electronic transmission, I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.

☐ **BY FAX TRANSMISSION.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax number(s) listed above. No error was reported by the fax machine that I used.

- 1 -

1 addressed to the persons at the addresses listed in the attached Proof of Service List and providing them
2 to a professional messenger service for service.

3 ☐ **BY UNITED STATES MAIL.** I enclosed the documents in a sealed envelope or package
4 addressed to the persons at the addresses in the attached Proof of Service List:

5 ☐ deposited the sealed envelope with the United States Postal Service, with the postage fully
6 prepared.

7 ☐ placed the envelope for collection and mailing, following our ordinary business practices.
8 I am readily familiar with this business's practice for collecting and processing correspondence for
9 mailing. On the same day that correspondence is placed for collection and mailing, it is deposited
10 in the ordinary course of business with the United States Postal Service, in a sealed envelope with
11 postage fully prepaid.

12 I am a resident of and employed in the county where the mailing occurred. The envelope or
13 package was placed in the mail at Los Angeles, California.

14 ☐ **BY PERSONAL SERVICE.** I personally delivered the documents to the persons at the addresses
15 listed in the attached Proof of Service List. (1) For a party represented by an attorney, delivery was made
16 (a) to the attorney personally; or (b) by leaving the documents at the attorney's office, in an envelope or
17 package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge
18 of the office; or (c) if there was no person in the office with whom the notice or papers could be left, by
19 leaving them in a conspicuous place in the office between the hours of nine in the morning and five in
20 the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's
21 residence with some person not younger than 18 years of age between the hours of eight in the morning
22 and six in the evening.

23 CMC

24 I declare under penalty of perjury under the laws of the State of California, that the foregoing is true
25 and correct.

26 Executed on February 1, 2022 at Los Angeles, California.

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28 _____
Rana Nader