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individually, and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MARLENA JENNINGS AND MAKIYAH
KIYOI, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

KNIGHTED VENTURES, LLC; and DOES
1 through 20, inclusive,

Defendants.

Case No. 21CV391681

*Assigned for all purposes to
Hon. Theodore C. Zayner
Dept. 19*

**PROPOSED ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND ENTERING
JUDGMENT**

Date: October 28, 2026
Time: 1:30pm
Dept.: 8

1 The Court has received and considered the joint stipulation of Plaintiffs Marlana Jennings
2 and Makiyah Kiyoi, as an individual, and on behalf of the people of the State of California and as
3 an “aggrieved employee” acting as a private attorney general under the Labor Code Private
4 Attorneys General Act of 2004, § 2699, *et seq.* (“PAGA”) and Defendant Knighted Ventures,
5 LLC in the above-captioned action.

6 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

7 The Judgment incorporates by reference the definitions in the PAGA Settlement
8 Agreement (the “Settlement”), a copy of which is attached as Exhibit 1 to the Declaration of
9 Jessica L. Campbell in Support of Motion for Approval of PAGA Settlement, and all terms
10 defined therein shall have the same meaning as set forth in the Settlement.

11 The Court hereby approves the Parties’ proposed Settlement and hereby enters FINAL
12 JUDGMENT based on the terms set forth in the Parties’ Settlement in favor of Plaintiff and the
13 Aggrieved Employees in the Gross Settlement Amount of \$1,600,000.00. Of this, one-third of the
14 Gross Settlement Amount (\$533,333.33) is awarded as attorney fees paid to Plaintiff’s Counsel,
15 \$60,000.00 is awarded as costs paid to Plaintiff’s Counsel, \$10,000.00 is awarded to Plaintiffs in
16 exchange for a General Release, and \$14,591.00 is awarded as administrative costs paid to the
17 Settlement Administrator. Of the remaining Net Settlement Amount of \$972,075.67, 75% (which
18 is \$729,056.75) shall be paid to the Labor and Workforce Development Agency and 25% (which
19 is \$243,018.92) shall be paid to the Aggrieved Employees as set forth in the Settlement
20 Agreement.

21 The Court hereby approves, as to form and content, the notice to be distributed to the
22 PAGA Employees, attached to the Settlement as Exhibit A. All Individual Settlement Checks
23 will expire 180 days after the initial mailing. Any uncashed funds shall be transmitted to the
24 California Controller's Unclaimed Property Fund in the name of each Aggrieved Employee whose
25 check is voided.

26 A Final Non-Appearance Hearing is set for October 28, 2027 at 8:30 a.m. before this
27 Court. The administrator is to file a declaration no later than 5 court days in advance to confirm
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1 that the distribution of funds is complete, including any distribution to the State Controller per
2 the settlement agreement.

3 This Judgment is intended to be a final disposition in its entirety of the above captioned
4 action. Without affecting the finality of this judgment in any way, the Court retains jurisdiction
5 of all matters relating to the interpretation, administration, implementation, effectuation, and
6 enforcement of the Settlement pursuant to C.C.P. § 664.6.

7 IT IS SO ORDERED.

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9 Dated: _____

10 Hon. Theodore C. Zayner
11 Judge of the Superior Court
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