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7 Individually and on behalf of all other Aggrieved Employees

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES – BURBANK COURTHOUSE**

11
12 SUSAN BERMUDEZ, individually and on
behalf of all other Aggrieved Employees,

13 Plaintiff,

14 v.

15 CRI-HELP, INC., a California Corporation,
16 and DOES 1 through 50, inclusive,

17 Defendants.
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CASE NO. 22BBCV00251

*[Assigned for all purposes to the Hon. Frank
M. Tavelman, Dept. A]*

~~[PROPOSED]~~ FINAL JUDGMENT

Filed Concurrently With:

1. Joint Stipulation Requesting Approval of Representative PAGA Settlement
2. Declaration of Haig B. Kazandjian in Support thereof
3. [Proposed] Order Approving Representative PAGA Settlement

Complaint Filed: April 18, 2022

21 The Court has received and considered the application of Plaintiff SUSAN BERMUDEZ
22 on her own behalf and on behalf of the people of the State of California, and as an “aggrieved
23 employee” acting as private attorney general under the Labor Code Private Attorneys General
24 Act of 2004, § 2698, et seq. (“PAGA”) for approval of the PAGA Settlement Agreement
25 (“PAGA Settlement Agreement” or “Settlement”) entered into between Plaintiff on behalf of the
26 State of California as a private attorney general pursuant to PAGA and Defendant CRI-HELP,
27 INC., a California corporation, and DOES 1 through 50, inclusive (hereinafter “Defendant”) and
28 has entered an Order for Approval of the Representative PAGA Settlement.

FILED
Superior Court of California
County of Los Angeles
08/16/2023

David W. Slayton, Executive Officer / Clerk of Court

By: L. Garcia Deputy

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

The Court hereby enters FINAL JUDGMENT in favor of Plaintiff and the Aggrieved Employees in the amount of \$165,000.00 for alleged PAGA penalties under Labor Code § 2699 in violation of the Labor Code, including, Labor Code Sections 201, 202, 203, 204, 226(a), 226.7, 246, 432, 510, 512(a), 558(a), 558.1, 1174(d), 1182.12, 1194, 1197, 1197.1, 1198, 2800, and 2802, and California Code of Regulations Sections 11050(5)(A) and 11050(4)(C).

The Judgment is awarded and allocated as follows:

- (a) PAGA Counsel's attorneys' fees in the amount of \$66,000.00, which is 40% of the \$165,000.00 Gross Settlement Amount;
- (b) PAGA Counsel's costs in an amount not to exceed \$8,500.00;
- (c) Administration costs of no more than \$4,500.00 to be paid to the Settlement Administrator;
- (d) \$5,000.00 to Plaintiff SUSAN BERMUDEZ as an incentive award and general release; and
- (e) the remainder of the Settlement Payment after deducting the items (a), (b), (c) and (d)

herein shall be designated as PAGA Penalties, which is estimated to be \$81,000.00, and will be allocated between the LWDA and the Aggrieved Employees pursuant to Labor Code section 2699(i) with 75% paid to the LWDA (\$60,750.00) and 25% paid to the Aggrieved Employees on a pro-rata basis (\$20,250.00).

Defendant shall have no further liability for costs, expenses, interests, attorneys' fees, or for any other charge, expense or liability and shall be released from all Covered Claims, all as set forth in the PAGA Settlement Agreement and Order for Approval of the Representative PAGA Settlement.

This “Judgment” is intended to be a final disposition of the above captioned action in its entirety and is intended to be immediately appealable.

Dated: 08/16/2023

F.M. Law

Honorable Frank M. Tavelman

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action; my business address is 801 North Brand Boulevard, Suite 970,
Glendale, California 91203.

5 On July 6, 2023, I served the foregoing document(s) described as: **[PROPOSED] FINAL**
6 **JUDGMENT**

7 by method indicated below, on the interested parties in this action as follows:

8 **SEE ATTACHED SERVICE LIST**

9 ☐ **BY PERSONAL DELIVERY:** I caused a copy of the document to be delivered personally
10 to the individual(s) named in the attached service list.

11 ☐ **BY OVERNIGHT DELIVERY:** I enclosed the above-listed document(s) in an envelope or
12 package provided by an overnight delivery carrier and addressed it to the referenced in
13 attached service list. I placed the envelope or package for collection and overnight delivery at
an area regularly utilized by said delivery carrier.

14 ☐ **BY U.S. MAIL:** I enclosed said document(s) in a sealed envelope or package to each
15 addressee. I placed the envelope for collection and mailing, following our firm's ordinary
16 business practices. I am readily familiar with the firm's practice for collecting and processing
correspondence for mailing. Under that practice, the correspondence is deposited with the
United States Postal Service, with postage fully prepaid, on the same day in the ordinary
course of business.

17 ☒ **BY ELECTRONIC MAIL:** I transmitted the foregoing document(s) by electronic mail
18 from **ingrid@hbklawyers.com** to the electronic mail addresses indicated on the attached
19 mailing list. The transmission was reported as complete and without error.

20 ☐ **BY FAX TRANSMISSION:** I transmitted the foregoing document(s) by facsimile
21 transmission from 818-696-2307 to the facsimile numbers indicated on the attached mailing
22 list. The transmission was reported as complete and without error on the transmission report,
which was properly issued by the transmitting facsimile machine and, pursuant to Rule
2.306(h)(4), a copy of which is attached to the original of this proof of service.

23 ☒ (STATE): I declare under penalty of perjury under the laws of the State of California that
24 the above is true and correct.

25 Executed on July 6, 2023, at Glendale, California.

26 /s/ Ingrid Cortez
27 Ingrid Cortez
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SERVICE LIST
SUSAN BERMUDEZ et al. v. CRI-HELP, INC., et al.
22BBCV00251

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