

(SIGNATURE)

PLAINTIFF/PETITIONER: Jesus Martinez
 DEFENDANT/RESPONDENT: JONDO, LTD, et al

CASE NUMBER:
 30-2022-01285408-CU-WT-CXC

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):
 Chami Law, PC
 11845 W. Olympic Blvd., Suite 1125
 Los Angeles, CA 90064
2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):
 - a. ☒ deposited the sealed envelope with the United States Postal Service.
 - b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
3. The *Notice of Entry of Judgment or Order* was mailed:
 - a. on (*date*): October 30, 2024
 - b. from (*city and state*): Los Angeles, CA - via electronic service
4. The envelope was addressed and mailed as follows:

a. Name of person served: Scott Lacunza Street address: via email: Scott.Lacunza@jacksonlewis.com City: Attorneys for all Defendants State and zip code: b. Name of person served: Street address: City: State and zip code:	c. Name of person served: Street address: City: State and zip code: d. Name of person served: Street address: City: State and zip code:
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☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached _____.

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

Date: October 30, 2024

Pouya Chami

(TYPE OR PRINT NAME OF DECLARANT)





(SIGNATURE OF DECLARANT)

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Attorney for Plaintiff
JESUS MARTINEZ

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

OCT 29 2024

DAVID H. YAMASAKI, Clerk of the Court

BY: CH, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

JESUS MARTINEZ, an individual,

Plaintiffs,

v.

JONDO LTD, a California corporation,
JONDO HOLDINGS LLC, a California
limited liability company, and DOES 1
through 50, inclusive,

Defendants.

CASE NO. 30-2022-01285408-CU-WT-CXC

**[PROPOSED] ORDER APPROVING PAGA
SETTLEMENT**

Judge: Hon. William Claster
Dept.: CX101
Complaint Filed: October 7, 2022
Trial Date: November 4, 2024

Hearing Date: October 25, 2024
Hearing Time: 9:00 a.m.
Reservation ID: 74353645

[PROPOSED] ORDER

Having reviewed the filed Motion to Approve the PAGA Settlement, the Declaration of Pouya Chami in Support thereof, the supplemental briefing from the parties, including the supplemental declarations, as well as the PAGA Settlement Agreement, and addendum to the PAGA Settlement Agreement, filed by JESUS MARTINEZ ("Plaintiff") and Defendants JONDO LTD, JONDO HOLDINGS LLC, JONDO GLOBAL HOLDINGS, INC., and JOHN S. DOE ("Defendants" and, together with Plaintiff, the "Parties"), the Court grants the Motion and Approves the PAGA Settlement Agreement and Orders as follows:

The Court finds the parties' settlement is "fair, reasonable, and adequate in view of PAGA's purposes to remediate present labor law violations, deter future ones, and to maximize enforcement of state labor laws." (*Moniz v. Adecco USA, Inc.* (2021) 72 Cal.App.5th 56, 72.) The Court approves the following distributions:

1. Attorneys' fees in the amount of \$60,000, or 30% of the GSA. The Court finds this amount to be a reasonable result in light of the quality of the result obtained, the work performed by counsel, and the estimated lodestar. In approving this amount, the Court is not approving any particular hourly billing rates proposed by counsel.

2. Litigation costs in the amount of \$4,061.51. This represents the full amount sought, less the costs incurred in filing the motions to compel responses to requests for admission and special interrogatories. When the Court granted those motions, it awarded the associated costs.

3. Administration costs in the amount of \$4,350, per the administrator's bid.

4. The amount remaining is to be distributed 75% to the LWDA and 25% to the aggrieved employees as required by statute.

Exercising its discretion, the Court declines to award an enhancement to Plaintiff. Based upon its review of Plaintiff's individual settlement agreement, the Court finds the amount Plaintiff received is more than sufficient to also compensate him for his services performed as a PAGA representative.

The administrator is to file a declaration no later than May 31, 2025 to confirm that the distribution of funds to aggrieved employees is complete. Upon receipt of the administrator's declaration, the Court will determine whether further briefing or a hearing is necessary.

Dated: 10-29-24



THE HONORABLE WILLIAM D. CLASTER