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Attorney for Defendant and Cross-Plaintiff
JENNIFER M. FULLER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

CELEBRITY FOUNDATION FOR
CHILDREN, a California Nonprofit
Corporation

Plaintiff,

JENNIFER M. FULLER, an individual;
and DOES 1 through 25, inclusive

Defendants.

JENNIFER M. FULLER, an individual,

Cross-Plaintiff,

v.

MICHAEL FARAH an individual, THE
CELEBRITY FOUNDATION FOR
CHILDREN, and DOES 1 through 5,
inclusive,

Cross-Defendants.

Case No.: CVRI2201097

Assigned to: Hon. Harold Hopp, Historic
Courthouse, Dept. 10

**NOTICE OF ORDER APPROVING PAGA
SETTLEMENT**

Case Filed: 3/17/22
Trial Date: None

TO THE LWDA AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE THAT on October 30, 2024, the Court in the above captioned action issued an order approving the parties' Private Attorneys General Act Agreement and Release. A copy of that order is attached hereto as **Exhibit A**.

Dated: November 4, 2024

Law Offices of Corbett H. Williams

By:

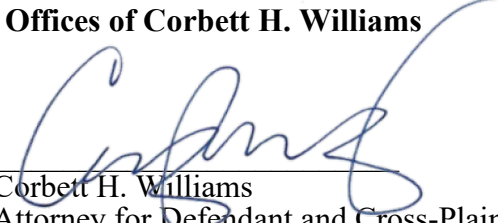

Corbett H. Williams
Attorney for Defendant and Cross-Plaintiff
JENNIFER FULLER

EXHIBIT A

Law Offices of Corbett H. Williams

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Attorney for Defendant and Cross-Plaintiff
JENNIFER M. FULLER

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

OCT 30 2024

E. Escobedo

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

CELEBRITY FOUNDATION FOR
CHILDREN, a California Nonprofit
Corporation

Plaintiff,

JENNIFER M. FULLER, an individual;
and DOES 1 through 25, inclusive

Defendants.

Case No.: CVRI2201097

Assigned to: Hon. Harold Hopp, Historic
Courthouse, Dept. 1

**PROPOSED ORDER APPROVING
PAGA SETTLEMENT**

JENNIFER M. FULLER, an individual,

Cross-Plaintiff,

v.

MICHAEL FARAH an individual, THE
CELEBRITY FOUNDATION FOR
CHILDREN, and DOES 1 through 5,
inclusive,

Cross-Defendants.

NOV 01 2024

ORDER

The Court has reviewed and considered: (1) the parties' Private Attorneys General Act Agreement and Release ("Settlement Agreement") entered into by Jennifer Fuller ("Fuller") and The Celebrity Foundation for Children ("Celebrity"); and (2) Fuller's Motion for Approval of PAGA Settlement, as well as all legal authorities and evidence submitted in support thereof. Having found this matter suitable for disposition without oral argument, and good cause appearing therefor, IT IS HEREBY ORDERED as follows:

1. The Court has jurisdiction over the subject matter of this proceeding and over all parties. Pursuant to Labor Code §2698(1)(2) of the California Labor Code Private Attorneys General Act of 2004, Cal. Lab. Code §§2698, *et seq.* ("PAGA"), the Court hereby approves the proposed settlement of the Fuller's PAGA claim under the terms and conditions set forth in the Settlement Agreement, subject to the terms of this Order.

2. For purposes of the settlement, the Court finds that the "Aggrieved Employees" are 13 individuals, including Fuller, employed from between March 31, 2021 and the date of this order by Celebrity and classified as independent contractors.

3. Subject to the terms of this Order, the Court finds that the terms set forth in the Settlement Agreement are fair and reasonable and therefore directs the parties to carry out and effectuate the settlement according to the terms in the Settlement Agreement.

4. The Court finds the Gross Settlement Amount of Fifty Thousand Dollars (\$50,000) provided for in the Settlement Agreement to be fair and reasonable. Under no condition will Celebrity's liability for payments under the Settlement Agreement exceed the Gross Settlement Amount.

5. The Court approves the distribution of the Gross Settlement Amount in accordance with the terms of the Settlement Agreement.

6. The Court approves the distribution of the "Net Settlement Amount," as defined in the Settlement Agreement, according to the following allocations set forth in the Settlement Agreement: (a) seventy-five percent (75%) shall be allocated to the Labor & Workforce Development Agency ("LWDA"); and (b) twenty-five percent (25%) shall be allocated to the

1 Aggrieved Employees. The twenty-five percent (25%) allocated to the Aggrieved Employees shall
2 be distributed on a pro-rata basis as provided in Paragraph 6 of the Settlement Agreement.

3 7. Aggrieved Employees shall not be required to submit a claim form to receive their
4 respective shares, and Aggrieved Employees shall not be permitted to exclude themselves from the
5 settlement. The total and individual number of weeks of employment by Aggrieved Employees
6 during the PAGA Period shall be calculated by Celebrity

7 8. The Court approves an award of attorneys' fees to be paid to Fuller's Counsel, Law
8 Office of Corbett H. Williams, from the Gross Settlement Amount in the amount of Sixteen
9 Thousand, Five Hundred Dollars (\$16,500) (*i.e.*, 33.33% of the Gross Settlement Amount), and
10 reimbursement of costs in the amount of Three Thousand, Six Hundred and Fifty-One Dollars and
11 Ninety-Nine Cents (\$3,651.99) that were incurred in the prosecution of the Lawsuit. The Court finds
12 such amounts reasonable in view of the results achieved in the Lawsuit and the time and effort
13 expended by Fuller's Counsel.

14 9. The Court approves Phoenix Class Action Administration Solutions to act as the
15 settlement administrator (the "Settlement Administrator") for purposes of this settlement. The Court
16 further approves payment from the Gross Settlement Amount to the Settlement Administrator for
17 its reasonable fees, costs, and expenses incurred in administering this settlement in accordance with
18 the terms of the Settlement Agreement in an amount not to exceed One Thousand, Seven Hundred,
19 Fifty Dollars and Fifty Cents (\$1,750.50).

20 10. The Court finds that as of the "Effective Date" (as that term is defined in the
21 Settlement Agreement), Fuller and all Aggrieved Employees release Celebrity (*i.e.*, Celebrity
22 Foundation for Children), and officers, directors, employees and agents from all statutory penalties
23 that could have been sought on behalf of the State of California for the violations identified in
24 Fuller's pre-filing letter to the LWDA during the period from March 31, 2021, through the date of
25 this order.

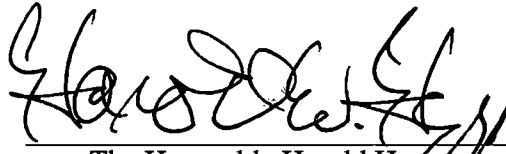
26 11. The Court approves the form of the payment explanation letter attached as Exhibit B
27 to the Settlement Agreement that is to accompany individual payments to Aggrieved Employees.

1 Such letter shall be distributed to Aggrieved Employees under the terms set forth in the Settlement
2 Agreement.

3 12. Fuller's Counsel shall file a declaration attesting to the disposition of the Gross
4 Settlement Amount no later than June 30, 2025. A Final Accounting (Nonappearance) Hearing
5 is set for July 14, 2025 at 8:30 am.

6 **IT IS SO ORDERED.**

7
8 Dated: 10/30/24


The Honorable Harold Hopp

CERTIFICATE OF SERVICE

I, Corbett H. Williams, declare as follows:

I am employed in the County of Orange, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 24422 Avenida de la Carlota, Suite 370, Laguna Hills, California, 92653, in said County and State. On **November 4, 2024**, I served the following document(s):

NOTICE OF ORDER APPROVING PAGA SETTLEMENT

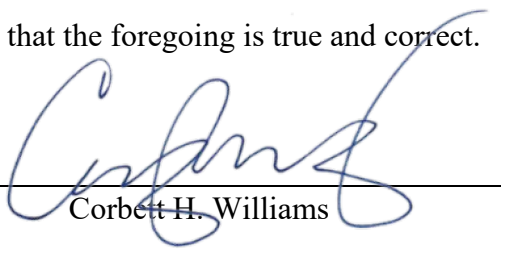
on the following parties: Attorney for Plaintiff and Cross-Defendants

Edward Susolik
David C. Palmer
Bryan C. Oberle
CALLAHAN & BLAINE, APLC
3 Hutton Centre Drive, Ninth Floor
Santa Ana, California 92707
dpalmer@callahan-law.com
es@callahan-law.com
boberle@callahan-law.com

by the following means of service:

- ☐ **BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY PERSONAL SERVICE:** I emailed a true copy of this document to a messenger with instructions to personally deliver it to each person[s] named at the address[es] shown before 5:00 p.m. on the above-mentioned date.
- ☐ **BY OVERNIGHT SERVICE:** On the above-mentioned date, I placed a true copy of the above mentioned document(s), together with an unsigned copy of this declaration, in a sealed envelope or package designated by Federal Express with delivery fees paid or provided for, addressed to the person(s) as indicated above and deposited same in a box or other facility regularly maintained by Federal Express or delivered same to an authorized courier or driver authorized by Federal Express to receive documents.
- X **BY ELECTRONIC SERVICE:** I caused a true copy of the above-mentioned document(s) to be served electronically through the electronic service platform of Janney & Janney Legal Support Service, to the email address(es) listed above, which is/are the email address listed in the Janney & Janney web portal for this case.
- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- ☐ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct.

Executed on **November 4, 2024**.


Corbett H. Williams

CERTIFICATE OF SERVICE

I, Corbett H. Williams, declare as follows:

I am employed in the County of Orange, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 24422 Avenida de la Carlota, Suite 370, Laguna Hills, California, 92653, in said County and State. On **November 4, 2024**, I served the following document(s):

NOTICE OF ORDER APPROVING PAGA SETTLEMENT

on the following parties:

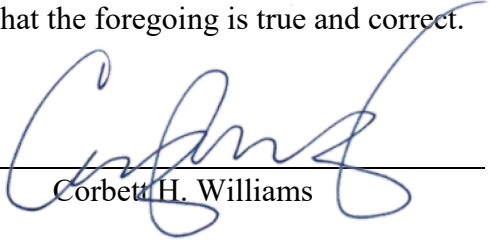
Labor and Workforce Development Agency.

by the following means of service:

- ☐ **BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY PERSONAL SERVICE:** I emailed a true copy of this document to a messenger with instructions to personally deliver it to each person[s] named at the address[es] shown before 5:00 p.m. on the above-mentioned date.
- ☒ **BY ELECTRONIC SERVICE:** I caused a true copy of the above-mentioned document(s) to be uploaded through the Labor and Workforce Development Agency's internet PAGA portal at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>.
- ☐ **BY OVERNIGHT SERVICE:** On the above-mentioned date, I placed a true copy of the above mentioned document(s), together with an unsigned copy of this declaration, in a sealed envelope or package designated by Federal Express with delivery fees paid or provided for, addressed to the person(s) as indicated above and deposited same in a box or other facility regularly maintained by Federal Express or delivered same to an authorized courier or driver authorized by Federal Express to receive documents.

- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- ☐ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct.

Executed on **November 4, 2024**.


Corbett H. Williams