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FILED
Superior Court of California
County of Los Angeles
12/14/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: M. Carino Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MARIO MARQUEZ, an individual, on behalf
of himself, all aggrieved employees, and the
State of California as a Private Attorneys
General,

Plaintiff,

vs.

RAYMOND HANDLING SOLUTIONS, INC.
a California Corporation, and DOES 1-50,
inclusive

Defendant.

Case No.: 21STCV46923
Assigned for all purposes to:
Honorable Timothy Patrick Dillon
Dept. 73

**~~PROPOSED~~ JUDGMENT RE APPROVAL
OF PAGA SETTLEMENT**

1 ~~PROPOSED~~ JUDGMENT

2 The Court has received and considered the Joint Stipulation Requesting Approval of
3 Settlement Pursuant to the Private Attorney general Act of 2004 entered into between Plaintiff Mario
4 Marquez, an individual, on behalf of the State of California as a private attorney general under the
5 California Labor Code Private Attorneys General Act (“PAGA”), and the Defendant Raymond
6 Handling Solutions, Inc.

7 Having received and considered the stipulation, the PAGA Settlement Agreement, and the
8 supporting papers filed, on December 7, 2022, the Court entered an order granting approval of the
9 PAGA Settlement Agreement and HEREBY ENTERS JUDGMENT AS FOLLOWS:

10 1. Except as otherwise defined in this Judgment (“Judgment”), all capitalized terms
11 have the same meaning as defined in the PAGA Settlement Agreement.

12 2. The California Labor Workforce and Development Agency (“LWDA”) has been
13 provided notice of the Settlement in accordance with PAGA, California Labor Code § 2699(1)(2),
14 (1)(4). On the date Plaintiff filed the motion seeking approval of the Settlement with the Court,
15 Plaintiff submitted to the LWDA a notice of the Settlement enclosing a copy of the Settlement
16 Agreement. Plaintiff’s notice of the Settlement to the LWDA complied with the notice requirements
17 of PAGA.

18 3. The Court confirms approval of the Settlement as to the Aggrieved Employees.

19 4. The Court has jurisdiction over the subject matter of this litigation, over all
20 Aggrieved Employees, and over those persons undertaking affirmative obligations under the
Settlement.

21 5. The Settlement is approved under Labor Code § 2699(1)(2).

22 6. The PAGA Settlement Notice to Aggrieved Employees fairly and adequately
23 describes the Action, the approved Settlement, and is the best notice practicable under the
circumstances.

24 7. The Court finds that each Aggrieved Employee, in accordance with the Settlement,
25 releases all Released Claims against the Released Parties.

26 8. The Gross Settlement Amount and the methodology used to calculate the Individual

1 Penalty Payments in accordance with the Settlement is approved.

2 9. The Court approves CPT Group, Inc. to act as the Settlement Administrator. The
3 Court awards the Settlement Administrator in this Action its actual fees and costs in accordance
4 with the terms of the Settlement Agreement, not to exceed \$10,000.

5 10. The Court approves the Koul Law Firm and Majarian Law Group APC as PAGA
6 Class Counsel.

7 11. The Court awards PAGA Class Counsel attorneys' fees in the amount of \$262,500
8 and actual litigation costs of \$13,083.38, both of which the Court finds to be fair and reasonable.
9 The Court authorizes the Settlement Administrator to make these payments, in accordance with the
10 terms of the Settlement Agreement.

11 12. The Court approves Plaintiff's Enhancement Award of \$7,500 for his services in
12 bringing the Action on behalf of the Aggrieved Employees and State of California;

13 13. The Court authorizes the Settlement Administrator to calculate and pay the
14 Individual Penalty Payments in accordance with the terms of the Settlement Agreement.

15 14. The Court authorizes the Settlement Administrator to pay the LWDA Payment in
16 accordance with the terms of the Settlement Agreement.

17 15. Checks for Individual Penalty Payments sent to Aggrieved Employees shall be valid
18 for 180 days after issuance. Funds remaining from any checks for Individual Penalty Payments
19 uncashed after 180 days will be dispersed to the state controller unpaid payment fund in the name
20 of the Aggrieved Employee.

21 16. Upon completion of the Settlement, the Settlement Administrator will provide
written certification of the completion to the Court and counsel for the Parties which shall be filed
21 with the Court within 30 days after completion of the Settlement.

22 17. Without affecting the finality of this entry of judgment, the Court retains exclusive
23 and continuing jurisdiction over this Action for purposes of supervising, administering,
24 implementing, and enforcement of the order granting approval of the Settlement, including per 664.6.

25 18. Nothing in this Judgement or the Settlement shall be construed as an admission or
26 concession by any party. The Settlement and this resulting order and entry of judgement simply

1 represent a compromise of disputed allegations.

2 19. The Court enters final judgment in accordance with the terms of the Settlement
3 Agreement.

4 20. Plaintiff is directed to submit a copy of this Judgment to the LWDA within 10 days
5 of the date of this Judgment.

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7 **IT IS SO ORDERED AND ADJUDICATED:**

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9 DATED: 12/14/2022





Judge of the Superior Court

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Timothy Patrick Dillon / Judge

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PROOF OF SERVICE

Case No. 21STCV46923

Marquez v. Raymond Handling Solutions, Inc.

I, JACKELINE HERNANDEZ declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the entitled case. The name and address of my residence or business is KOUL LAW FIRM, 3435 Wilshire Blvd. Ste. 1710, Los Angeles, California 90010.

On December 13, 2022, I served the foregoing document described as:

[PROPOSED] JUDGMENT RE APPROVAL OF PAGA SETTLEMENT

- _____ by placing the document(s) listed above in a sealed envelope, addressed as set forth below, and placing the envelope for collection and mailing in the place designated for such in our offices, following ordinary business practices.
- _____ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00PM.
- X_____ by transmitting via electronic mail the document(s) listed above to the electronic mailing address set forth below on this date.
- _____ by causing a true copy thereof to be personally delivered to the person(s) at the address(es) set forth below.

on the parties listed below by placing a true copy thereof enclosed in a sealed envelope for collection and mailing in the United States Postal Service following ordinary business practices at Los Angeles, California addressed as follows:

SEE ATTACHED SERVICE LIST

I am readily familiar with the ordinary practice of the business of collecting, processing and depositing correspondence in the United States Postal Service and that the correspondence will be deposited the same day with postage thereon fully prepaid.

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

Executed on this December 13, 2022, in Los Angeles, California.



JACKELINE HERNANDEZ

PROOF OF SERVICE

Case No. 21STCV46923

Marquez v. Raymond Handling Solutions, Inc.

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