

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

CANDICE RICHARD, a proxy for the State of
California as an aggrieved employee pursuant to
the Private Attorneys General Act (“PAGA”),

Plaintiff,

vs.

DIMENSION DEVELOPMENT COMPANY,
INC., G&B HOTEL EMPLOYEE LEASING
LLC, and DOES 1 through 10, inclusive,

Defendants.

Case No.: 30-2022-01261804-CU-OE-CXC

Assigned for all purposes to Hon. Randall J.
Sherman

ENFORCEMENT ACTION UNDER THE
PRIVATE ATTORNEYS GENERAL ACT,
CALIFORNIA LABOR CODE §§ 2698 ET
SEQ.

**[PROPOSED] ORDER OF APPROVAL OF
PAGA SETTLEMENT AND FINAL
JUDGMENT**

1 **ORDER AND JUDGMENT**

2 The Court has received and considered the Joint Stipulation re PAGA Settlement and Release, as
3 amended (“PAGA Settlement” or “Settlement Agreement”), of Plaintiff Candice Richard, as an
4 individual, and on behalf of the State of California and as an aggrieved employee acting as a private
5 attorney general under California’s Private Attorneys General Act of 2004, Labor Code section 2698, et
6 seq. (“PAGA”) and Defendants Dimension Development Company, Inc. and G&B Hotel Employee
7 Leasing, LLC (“Defendants”) (together the “Parties”) in the above-captioned action filed on May 23,
8 2022.

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

10 The Court approves the Parties’ PAGA Settlement and enters FINAL JUDGMENT based on
11 the terms set forth in the Parties’ Settlement Agreement in favor of Plaintiff and the Aggrieved
12 Employees in the amount of \$650,000. Of this, \$216,666.66 is awarded as attorneys’ fees and
13 \$23,716.82 in costs paid to Plaintiff’s Counsel, the Law Offices of Mark Yablonovich; \$3,000.00 is
14 awarded to Plaintiff as a Service Award Payment; ~~up to~~ \$7,012.00 is awarded as Settlement
15 Administration Costs paid to the Settlement Administrator, Atticus Administration; and ~~up to~~
16 \$399,604.52 is awarded as PAGA civil penalties of which 75%, or \$299,703.39, will be paid to the
17 California Labor and Workforce Development Agency and 25%, or \$99,901.13, will be part of the Net
18 PAGA Settlement Amount to be distributed to the Aggrieved Employees.

19 As a result of this Judgment, and except as to such rights or claims as may be created by this
20 Settlement Agreement, the State of California shall be deemed to have fully released and discharged the
21 Released Parties from the Released Claims during the PAGA Period, and each and every Aggrieved
22 Employee (which includes any legal heirs and/or successors-in-interest of each and every Aggrieved
23 Employee), fully releases and discharges the Released Parties from the Released Claims during the
24 PAGA Period. Aggrieved Employees, other than Plaintiff, will not be deemed to have released any
25 individual wage and hour claims based on alleged violations of the Labor Code or of a California Wage
26 Order, for which they have a private right of action, by virtue of the Settlement Agreement during the
27 PAGA Period.
28

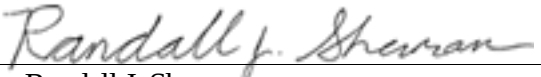
1 Plaintiff waives any rights to appeal this Judgment except an unfavorable ruling on the Motion
2 for Approval of PAGA Settlement.

3 This Judgment is intended to be a final disposition in its entirety of the above-captioned action.

4 This Court shall retain jurisdiction to enforce the terms of the Settlement.

5 **IT IS SO ORDERED.**

6
7 Dated: **April 26, 2024**


Hon. Randall J. Sherman
Judge of the Superior Court

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles. I declare that I am over the age of eighteen (18) and not a party to this action. My business address is: 9595 Wilshire Boulevard, Suite 900, Beverly Hills, CA 90212.

On April 26, 2024, I served the following document described below as:

[PROPOSED] ORDER OF APPROVAL OF PAGA SETTLEMENT AND FINAL JUDGMENT

on the interested parties in this action, addressed as follows:

Diana Estrada
Brian Foster
WILSON, ELSE, MOSKOWITZ, EDELMAN &
DICKER LLP
555 South Flower Street, Suite 2900
Los Angeles, CA 90071
Brian.Foster@wilsonelser.com
Diana.Estrada@wilsonelser.com
Michelle.Kang@wilsonelser.com

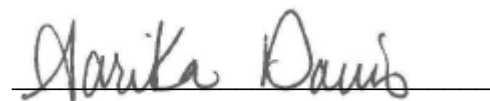
☐ **MAIL:** I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with U.S. postal service on that same day in the ordinary course of business.

☐ **BY FEDEX:** I placed such envelope in the FedEx drop slot for priority overnight service. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with FedEx on that same day in the ordinary course of business.

☒ **BY ELECTRONIC SERVICE:** I caused such documents to be uploaded and served electronically on the date specified, via One Legal on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

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

Executed on April 26, 2024, at Los Angeles, California.


Aarika Davis

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28