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JESUS MENDOZA VARGAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES- CENTRAL DISTRICT

JESUS MENDOZA VARGAS, an individual,

Plaintiff,

v.

CAR PARK, INC., a California corporation;
and DOES 1 through 20, inclusive,

Defendants.

Case No.: 22STCV18591

Assigned to the Hon. Wendy Chang, Dept. 36

**[PROPOSED] ORDER APPROVING PAGA
SETTLEMENT AND JUDGMENT THEREON**

RESERVATION ID: 225715084936

Date: March 6, 2025
Time: 8:30 a.m.
Dept.: 36

Action filed: June 6, 2022
Trial date: Vacated

On March 6, 2025, a Motion for an Order Approving the PAGA Settlement came on regularly for hearing before this Court in Department 36 of the Superior Court, County of Los Angeles. The Court, having considered the Motion by Plaintiff requesting the Court's approval of the PAGA Settlement pursuant to California Labor Code §§2699 et seq., and good cause appearing therefor, now makes the following orders:

The Labor and Workforce Development Agency ("LWDA") has been given notice of the Settlement. In particular, Plaintiff filed the motion seeking approval of the Settlement with the Court and submitted to the LWDA a copy of the Settlement Agreement. Plaintiff's submission of the Settlement Agreement complied with the requirements of PAGA.

1 2. The representative PAGA Settlement in the total amount of **\$20,000.00**, as part of the
2 settlement of the Parties has been reviewed by the Court and is hereby approved pursuant to the Labor
3 Code § 2699(l)(2). From this amount, the following allocations shall be made:

4 a. **\$6,000.00** shall be paid to the Law Offices of Ramin R. Younessi, A.P.L.C., as
5 attorney's fees and costs in connection with the PAGA Settlement pursuant to Labor Code §
6 2699(g)(1);

7 b. A maximum of **\$2,000.00** shall be paid to the PAGA administrator in
8 consideration for administration and distribution of the PAGA Settlement Funds;

9 3. After the allocation of Attorney's Fees and Administrator costs, 75% of the net settlement
10 amount will be paid to the LWDA and the remaining 25% of the net settlement amount shall be
11 distributed in a pro rata share to the "Aggrieved Employees" in accordance with the terms of the
12 settlement.

13 4. The terms "Aggrieved Employees" and "PAGA Settling Employees" are defined as "all
14 current and former non-exempt employees employed by Car Park, Inc. who worked during the PAGA
15 Period."

16 5. The PAGA Period is defined as "the period from March 2, 2021 to the Effective Date."

17 6. A Notice will be sent to each Aggrieved Employee accompanying their PAGA Settlement
18 Payment. A copy of this notice was attached as Exhibit 3 to the Declaration of Christopher S. Afgani in
19 support of the Motion for Approval of PAGA Settlement.

20 7. Checks for Aggrieved Employees shall be valid for 180 days after issuance. Funds
21 remaining from any uncashed checks for any Aggrieved Employees after 180 days will be disbursed to
22 the California Labor and Workforce Development Agency.

23 8. Upon completion of the distribution of the PAGA Settlement Payments as set forth in the
24 Settlement Agreement, the Settlement Administrator will submit a final accounting and report of the
25 distribution of the settlement, including the amount to be paid to the California Labor and Workforce
26 Development Agency. A final accounting hearing will be held on _____ at _____, in
27 Department 36.
28

1 9. The Court will retain jurisdiction over the Parties pursuant to California Code of Civil
2 Procedure § 664.6 for the purposes of supervising, administering, implementing, interpreting, and
3 enforcing this Order as well as the Settlement.

4 10. Nothing in this Judgment or the Settlement shall be construed as an admission or
5 concession by any party. The Settlement and this resulting Judgment simply represent a compromise of
6 disputed allegations.

7 11. Plaintiff is ordered to submit a copy of this Judgment to the LWDA within ten calendar
8 days of the entry of the Judgment.

9 12. The Action is hereby DISMISSED WITH PREJUDICE.

10 **IT IS SO ORDERED.**

11
12 DATED: _____

Honorable Wendy Chang

JUDGE OF THE SUPERIOR COURT

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 and
4 not a party to the within action. My business address is 3435 Wilshire Boulevard, Suite 2200, Los Angeles, California 90010.

5 On December 11, 2024, I served the foregoing document described as **[PROPOSED] ORDER**
6 **APPROVING PAGA SETTLEMENT AND JUDGMENT THEREON** on the interested parties in this action as follows:

7 ☒ By emailing true copies addressed to each addressee as follows:

8 Steve Belilove, Esq. *Attorneys for Defendants*

9 Taylor White, Esq.

10 Barry Z. Brodsky, Esq.

11 Laura Birnbaum, Esq.

12 Kaufman Dolowich & Voluck, LLP

13 11111 Santa Monica Blvd. Suite 850

14 Los Angeles, CA 90025

15 E-mail: bbrodsky@kdvlaw.com

16 lbirnbaum@kaufmandolowich.com

17 sbelilove@kaufmandolowich.com

18 elange@kaufmandolowich.com

19 taylor.white@kaufmandolowich.com

20 Richard Meaglia, Esq.

21 688 W. Foothill Blvd.

22 Monrovia, CA 91016

23 E-mail: meagric@aol.com

24 California Labor & Workforce Development
25 Agency

26 Attn. PAGA Administrator

27 1515 Clay Street, Ste. 801

28 Oakland, CA 94612

(VIA ELECTRONIC SERVICE ONLY)

23 ☒ BY ELECTRONIC TRANSMISSION. Pursuant to Code of Civil Procedure §§ 1010.6(a)(2),
24 1010.6(e), and 1013(g), and/or California Rules of Court 2.251(b)(1)-(2), I transmitted a copy of
25 the aforementioned document to each addressee above to the email address(es) indicated. No
26 electronic message or other indication that the transmission was unsuccessful was received
27 within a reasonable time after the transmission.

26 ☒ BY ELECTRONIC SERVICE: Pursuant to SB 836, I electronically filed a copy of the
27 aforementioned document with California Labor & Workforce Development Agency Only.

28 ///

1 Executed on December 11, 2024, at Los Angeles, California.



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

3
4 Elizabeth Pineda

