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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10 **SANTA MONICA COURTHOUSE**

11 STEVEN F. MANGO II, an individual,

12 Plaintiff,

13 v.

14 BEVERLY HILLS BEAUTY & AESTHETICS
15 A MEDICAL CORPORATION, a California
16 corporation, TIFFANY ELISHA HOLLIDAY,
17 an individual, and DOES 1 through 20, inclusive,

Defendants.

Case No. 22SMCV00452

**STIPULATION AND [PROPOSED]
ORDER REGARDING THE DISMISSALS
OF PLAINTIFF'S PAGA CLAIMS
AGAINST THE DEFENDANTS**

18 **IT IS HEREBY STIPULATED** by and between the Plaintiff, Steven F. Mango II, and
19 Defendants, Beverly Hills Beauty & Aesthetics A Medical Corporation ("BHB") and Tiffany Elisha
20 Holliday, by and through their respective undersigned counsel, that:

21 1. Pursuant to the parties' agreement to settle all of the Plaintiff's individual claims
22 against the Defendants in the above-captioned action, the Court shall enter an Order: (a) approving
23 the settlement of Plaintiff's claims against Defendants under the Private Attorneys General Act of
24 2004, California Labor Code §2698 et seq. ("PAGA"), on behalf of himself (hereinafter referred to
25 as "Plaintiff's individual PAGA Claims") and dismissing Plaintiff's individual PAGA claims with
26 prejudice; (b) dismissing Plaintiff's PAGA claims against Defendants on behalf of the other allegedly
27 aggrieved employees of Defendant BHBA without prejudice; and (c) dismissing Plaintiff's non-
28 PAGA claims against Defendants with prejudice.

2. This Stipulation and [Proposed] Order may be executed in counterparts.

Dated: March 14, 2023

Respectfully submitted,

By: 

Daniel V. Santiago, Esq.
Attorney for Plaintiff,
STEVEN F. MANCO II

Dated: March 14, 2023

Respectfully submitted,

By: 

Nannina L. Angioni, Esq.
Attorney for Defendants,
BEVERLY HILLS BEAUTY & AESTHETICS
A MEDICAL CORPORATION and
TIFFANY ELSHA HOLLIDAY

[PROPOSED] ORDER

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation and, in accordance with the parties' agreement to settle all of the Plaintiff's individual claims against the Defendants in the Action described in the Declaration of Daniel V. Santiago, Orders that:

1. The Court hereby approves of the settlement of Plaintiff's individual PAGA claims against the Defendants for Five Hundred Dollars (\$500) (Three Hundred Seventy Five Dollars [\$375] to be paid to the State of California Labor and Workforce Development Agency ["LWDA"] and One Hundred Twenty Five Dollars [\$125] to be paid to Plaintiff).

2. The Court hereby dismisses Plaintiff's individual PAGA claims against the Defendants with prejudice.

3. The Court hereby dismisses Plaintiff's PAGA claims against Defendants on behalf of the other allegedly aggrieved employees of Defendant BHBA without prejudice.

4. The Court hereby dismisses the remaining claims at issue in the Action (i.e., Plaintiff's non-PAGA claims against the Defendants) with prejudice.

5. Plaintiff's counsel shall provide the LWDA with prompt notice of the entry of this Order.

Dated: _____

Judge of the Superior Court of California,
County of Los Angeles

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PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. My business address is Law Offices of Daniel V. Santiago, P.C., 355 South Grand Ave., Suite 2450, Los Angeles, California 90071.

On March 14th, 2023, I served the following document(s):

**STIPULATION AND [PROPOSED] ORDER REGARDING THE DISMISSALS OF
PLAINTIFF'S PAGA CLAIMS AGAINST THE DEFENDANTS**

upon the following person(s):

Nannina L. Angioni, Esq.
(NAngioni@kaedianllp.com)

Sarah Swanson
(SSwanson@kaedianllp.com)

Tracy Vena
(TVena@kaedianllp.com)

Henry Whitehead
(HWhitehead@kaedianllp.com)

Kaedian LLP

8383 Wilshire Boulevard, Suite 210
Beverly Hills, California 90211

(Counsel for Defendants Beverly Hills Beauty & Aesthetics A Medical Corporation
and Tiffany Elisha Holliday)

X BY ELECTRONIC MAIL: On the above-mentioned date, from San Diego, California, I caused each such document to be transmitted electronically to the party(ies) at the e-mail address(es) indicated above. To the best of my knowledge, the transmission was reported as complete, and no error was reported that the electronic transmission was not completed.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on March 14 2023, at San Diego, California.


Daniel V. Santiago