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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF SACRAMENTO

11 WILLIAM JEFF BARE, on behalf of the
general public as private attorney general,

12 Plaintiff,

13 v.
14

15 AT&T SERVICES INC.; a Delaware
Corporation; and DOES 1-50, inclusive,

16 Defendant.
17

Case No. 34-2022-00321000
[Assigned for all purposes to Judge Jill H.
Talley, Dept. 23]

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

Date: October 11, 2024
Time: 9:00 AM
Dept.: 23

RESERVATION A-321000-001

1 **[PROPOSED] ORDER**

2 This matter came on for hearing on October 11, 2024 at 9:00 a.m. in Department 23 of the
3 above-entitled Court, the Honorable Jill H. Talley presiding. Based on the pleadings on record,
4 all papers submitted in connection with Plaintiff's Notice of Unopposed Motion and Motion to
5 Approve Individual PAGA Settlement (the "Motion"), and for good cause appearing, Plaintiff's
6 Unopposed Motion is GRANTED.

7 The Court having reviewed the Settlement and General Release Agreement ("Settlement"
8 or "Settlement Agreement") hereby ORDERS AND ADJUDGES:

9 1. The Court, for purposes of this Order, refers to all defined terms as set forth in the
10 Settlement Agreement.

11 2. The Court finds the Individual Settlement was entered into in good faith, that the
12 individual settlement is fair, reasonable and adequate, and that the settlement satisfies the
13 standards and applicable requirements for approval of PAGA representative actions under
14 California law. The Settlement is hereby accepted and approved.

15 3. The Parties shall bear their own respective attorneys' fees and costs, except as
16 otherwise provided for in the Settlement and approved by the Court.

17 4. The Settlement is not an admission by Defendant nor is this Order a finding of the
18 validity of any allegations or of any wrongdoing by Defendant. Neither this Order, the
19 Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement,
20 may be used as an admission of any fault, wrongdoing, omission, concession, or liability
21 whatsoever by or against Defendant.

22 5. Defendant shall pay the Gross Settlement Amount of \$50,000.00 according to the
23 terms of the Settlement Agreement.

24 (a) The Court approves payment to Plaintiff's counsel of Attorneys' Fees and costs in
25 the amount of \$22,009.63 to be paid from the Gross Settlement Amount

26 (b) The Court approves payment to Plaintiff in the amount of \$27,765.37 for
27 settlement of his individual PAGA claims. Of this amount, \$75.00 will be for the
28 25% portion of the Settlement Sum attributed to BARE'S individual PAGA claim.

1 (c) The Court approves payment to the California Labor and Workforce Development
2 Agency ("LWDA") in the amount of \$225.00 (Two Hundred and Twenty Five
3 Dollars and Zero Cents) representing compensation for any penalties allegedly due
4 to the LWDA pursuant to PAGA. This amount represents 75% of the portion of
5 the Settlement Sum attributed to BARE's individual PAGA claim.

6 6. By operation of this Order, Plaintiff shall fully, finally, and forever release and
7 discharge Defendant and the Released Parties from any and all of Plaintiff's released claims
8 and shall be forever barred from pursuing such released claims against Defendant and the
9 Released Parties.

10 7. Under California Code of Civil Procedure section 664.6, the Court retains
11 jurisdiction over the Parties to the fullest extent necessary to interpret, enforce, and effectuate the
12 terms and intent of the Settlement and this Order.

13 8. Plaintiff's counsel shall submit a copy of this Order to the LWDA within seven
14 (7) days of the entry of the Order.

15 9. The above-referenced action and all claims asserted by Plaintiff individually are
16 hereby dismissed with prejudice.

17
18 **IT IS SO ORDERED AND ADJUDGED. LET JUDGMENT BE FORTHWITH**
19 **ENTERED ACCORDINGLY.**

20 DATED: _____

21 _____
22 THE HONORABLE JILL H. TALLEY
23 JUDGE OF THE SUPERIOR COURT
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