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Attorneys for Plaintiff Lorraine Sheldon

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

LORRAINE SHELDON, as an aggrieved
employee pursuant to the Private Attorneys
General Act ("PAGA"),

Plaintiff,

vs.

EAST VALLEY GLENDORA HOSPITAL,
L.P., a California limited partnership; and DOES
1 through 10, inclusive,

Defendants.

Case No. BC612058

[AMENDED PROPOSED] JUDGMENT

FILED
Superior Court of California
County of Los Angeles

09/10/2019

Sherri R. Carter, Executive Officer / Clerk of Court

By: Etelvina Lopez Deputy

Pursuant to the Order Approving PAGA Settlement Agreement (the "Order"), it is hereby
ORDERED, ADJUDGED AND DECREED as follows:

1. Judgment in this matter is entered in accordance with the terms of the Order and the Parties' PAGA Settlement Agreement. Unless otherwise provided herein, all capitalized terms used herein shall have the same meaning as defined by the Parties' PAGA Settlement Agreement.

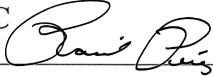
2. This Judgment shall be binding on all Aggrieved Employees and the State of California, who are hereby barred by the doctrine of res judicata from re-litigating the Settled Claims, as that term is defined by the PAGA Settlement Agreement. *See Arias v. Superior Court*, 46 Cal. 4th 969, 986 (2009) (holding that a judgment in a representative action brought by an aggrieved employee under PAGA is binding not only on the named employee plaintiff but also on state labor law enforcement agencies and any aggrieved employee not a party to the proceeding). Without affecting the finality of the Judgment, the Court shall retain exclusive and continuing jurisdiction over the above-captioned action and the parties for purposes of enforcing the terms of the Judgment entered herein.

3. This Judgment reflects the settlement of disputed claims. Neither this Judgment, the Order, the Parties' PAGA Settlement Agreement, any document referred to herein, any exhibit to any document referred to herein, any action taken to carry out the settlement, nor any negotiations or proceedings related to the settlement are to be construed as, or deemed to be evidence of, or an admission or concession with regard to, the denials or defenses of Defendant (or any settling party), and shall not be offered in evidence in any proceeding against the Parties hereto in any Court, administrative agency, or other tribunal for any purpose whatsoever other than to enforce the provisions of the Order and Judgment. This document shall constitute a judgment.

APPROVED AS TO FORM.

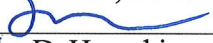
Dated: September 6, 2019

CAPSTONE LAW APC


Raul Perez
Attorneys for Plaintiff Lorraine Sheldon

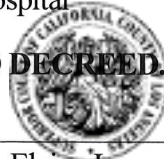
Dated: 9/6/2019

MORGAN, LEWIS & BOCKIUS LLP


John D. Hayashi
Attorneys for Defendant East Valley Glendora Hospital

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Date 09/10/2019



Hon. Elaine Lu Elaine Lu / Judge
Los Angeles County Superior Court Judge

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the State of California, County of Los Angeles. I am over the age of 18
4 and not a party to the within suit; my business address is 1875 Century Park East, Suite 1000, Los
Angeles, California 90067. My electronic address is matthew.krout@capstonelawyers.com.

5 On **September 6, 2019** I served the document described as:

6 **[AMENDED PROPOSED] JUDGMENT**

on the interested parties in this action by sending on the interested parties in this action by sending
[] the original [or] [✓] a true copy thereof [✓] to interested parties as follows:

7 Robert Jon Hendricks (SBN 179751)
8 Clifford D. Sethness (SBN 212975)
9 MORGAN, LEWIS & BOCKIUS LLP
300 South Grand Avenue, Twenty-Second Floor
Los Angeles, CA 90071-3132
Tel: 213.612.2500
Fax: 213.612.2501
E-mail: robert.hendricks@morganlewis.com
E-mail: clifford.sethness@morganlewis.com

John D. Hayashi (SBN 211077)
MORGAN, LEWIS & BOCKIUS LLP
600 Anton Boulevard, Suite 1800
Costa Mesa, CA 92626
Tel: 714.830.0600
Fax: 714.830.0700
E-mail: john.hayashi@morganlewis.com

12 [] **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s)
13 for mailing in the ordinary course of business at Los Angeles, California. I am “readily
14 familiar” with this firm’s practice of collection and processing correspondence for
mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal
Service that same day in the ordinary course of business with postage thereon fully
prepaid at Los Angeles, California.

15 [✓] **ELECTRONIC FILE & SERVE:** A true and correct copy of the above-referenced
16 document(s) was electronically served on counsel of record by means of uploading the
17 document to One Legal Court Filing website portal in accordance with the Court’s
Order.

18 [] **BY FAX:** I hereby certify that this document was served from Los Angeles, California,
19 by facsimile delivery on the parties listed herein at their most recent fax number of
record in this action.

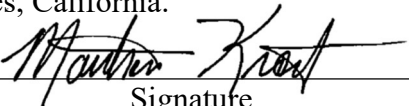
20 [] **BY PERSONAL SERVICE:** I caused the document to be personally delivered by
21 hand to the offices of the addressee(s) named herein via the attorney messenger service
ProLegal.

22 [] **BY OVERNIGHT DELIVERY:** I am “readily familiar” with this firm’s practice of
23 collection and processing correspondence for overnight delivery. Under that practice,
24 overnight packages are enclosed in a sealed envelope with a packing slip attached
thereto fully prepaid. The packages are picked up by the carrier at our offices or
delivered by our office to a designated collection site.

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

26 Executed this **September 6, 2019**, at Los Angeles, California.

27 Matthew Krout
Type or Print Name


Signature