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Attorneys for Plaintiff FRANCISCO MORALES,
on behalf of himself and on behalf of all other
aggrieved employees

[Additional counsel and party listed on following page]

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

FRANCISCO MORALES, on behalf of himself
and others similarly situated,

Plaintiff,

v.

MOC PRODUCTS COMPANY, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Case No. 22STCV17634

[CLASS ACTION]

Honorable Carolyn B. Kuhl
Dept.: 12, Spring Street Courthouse

**NOTICE OF ENTRY OF ORDER
GRANTING THE PRIVATE ATTORNEYS
GENERAL ACT SETTLEMENT AND
RELEASE UNDER CALIFORNIA LABOR
CODE §§ 2698 et. seq. AND FINAL
JUDGMENT**

1 **CAPSTONE LAW APC**

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13 Attorneys for Plaintiff FRANCISCO MORALES,
14 on behalf of himself and on behalf of all other
15 aggrieved employees
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the Court entered an Order Granting the Private Attorneys General Act Settlement and Release Under California Labor Code §§ 2698 et. Seq, attached here to as Exhibit A, and a Final Judgment on February 13, 2025, attached hereto as Exhibit B.

DATED: February 13, 2025

D.LAW, INC.

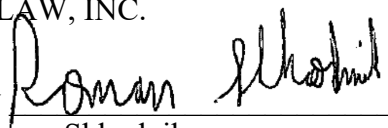
By 
Roman Shkodnik
Attorney for Plaintiff FRANCISCO
MORALES, on behalf of himself and
others similarly situated

EXHIBIT A

D.LAW, INC.
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Attorneys for Plaintiff FRANCISCO MORALES
on behalf of himself and on behalf of all other
aggrieved employees

(Additional counsel listed on next page)

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

FRANCISCO MORALES, on behalf of
himself and on behalf of all other aggrieved
employees,

Plaintiff,
vs.

MOC PRODUCTS COMPANY, INC., a
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 22STCV17634

Hon. Carolyn B. Kuhl

**[PROPOSED] ORDER APPROVING THE
PRIVATE ATTORNEYS GENERAL ACT
SETTLEMENT AND RELEASE UNDER
CALIFORNIA LABOR CODE §§ 2698 et
seq.**

*[filed concurrently with Notice of Motion and
Motion to Approve Settlement; Declaration of
David Yeremian; Declaration of Roman
Shkodnik; Declaration of Raul Perez]*

Date: February 13, 2025
Time: 10:30 a.m.
Dept.: SS12

FILED
Superior Court of California
County of Los Angeles
02/13/2025
David W. Slayton, Executive Officer/Clerk of Court
By: L. McGreene Deputy

1 **CAPSTONE LAW APC**

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7 Attorneys for Plaintiff FRANCISCO MORALES
on behalf of himself and on behalf of all other
8 aggrieved employees

1 Having considered Plaintiff's submission, documents submitted in support thereof,
2 Defendant's non-opposition to Plaintiff's Motion and good cause appearing, **IT IS HEREBY**
3 **ORDERED** that Plaintiff's Motion to Approve the Private Attorneys General Act Settlement and
4 Release is **GRANTED**, as follows:

5 a) All terms used herein shall have the same meaning as defined in the Private Attorney
6 General Act Settlement Agreement ("Settlement Agreement" or "Settlement").

7 b) The Court of Appeal *Moniz v. Adecco*, 72 72 Cal.App.5th 56, 77, held that it must
8 "determine independently whether a PAGA settlement is fair and reasonable," to protect "the
9 interests of the public and the LWDA in the enforcement of state labor laws." Here, the Court
10 hereby approves the terms set forth in the Settlement Agreement and finds that the Settlement is,
11 in all respects, fair, adequate, reasonable, and just and is not arbitrary, oppressive or confiscatory
12 and directs the Parties to effectuate the Settlement according to its terms. The Court finds that the
13 Settlement has been reached as a result of informed and non-collusive arm's-length negotiations.
14 The Court further finds that the Parties have conducted extensive investigation and research, and
15 their attorneys were able to reasonably evaluate their respective positions. The Court also finds
16 that settlement now will avoid additional and potentially substantial litigation costs, as well as
17 delay and risks if the Parties were to continue to litigate the case. The Court has reviewed the
18 monetary recovery being provided as part of the Settlement and recognizes the significant value
19 accorded to Plaintiff and each Aggrieved Employee.

20 c) The Settlement is not an admission by Defendant MOC Products Company, Inc.
21 ("Defendant") or Released Parties as defined below, nor is this Order a finding of the validity of
22 any allegations or of any wrongdoing by Defendant or Released Parties. Neither this Order, the
23 Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement,
24 may be construed as, or may be used as, an admission of any fault, wrongdoing, omission,
25 concession, or liability whatsoever by or against Defendant or Released Parties.

26 d) Defendant shall pay Aggrieved Employees, PAGA Counsel, Settlement Administrator
27 and LWDA pursuant to the terms of the Settlement.

28 e) The Court hereby confirms David Yeremian of the law firm David Yeremian &

1 Associates, Inc., Roman Shkodnik of D.Law, and Orlando Villalba, Helga Hakimi, and
2 Alexander Wallin of Capstone Law APC as PAGA Counsel.

3 f) The Court finds that the fees requested by PAGA Counsel of one-third of the total
4 settlement amount of \$170,000 which is Fifty-Six Thousand Six Hundred and Sixty-Six Dollars
5 and Sixty-Seven Cents (\$56,666.67) is reasonable and the costs requested of Twenty-One
6 Thousand and Ninety-Nine Dollars and Eighty-Four Cents (\$21,099.84) as reasonable and
7 necessary for the prosecution of this action. The Court hereby awards attorneys' fees in the
8 amount of \$56,666.67 and costs in the amount of \$21,099.84 to PAGA Counsel. The payment of
9 fees and costs to PAGA Counsel shall be made in accordance with the terms of the Settlement
10 and fee split between co-counsel. David Yeremian & Associates, Inc. and D.Law, Inc., have an
11 agreement with Capstone Law APC to share fees on a 70%/ 30% fee split basis. David Yeremian
12 & Associates, Inc. and D.Law, Inc. are receiving 70% and Capstone Law APC are receiving 30%.

13 g) The Court finds that the Administration costs of \$3,250.00 is reasonable and the Court
14 hereby awards administrator costs in the amount of \$3,250.00 to Phoenix.

15 h) The LWDA's 75% share of the net settlement amount of \$88,983.49 is \$66,737.61, and
16 the balance of \$22,245.88 shall be paid to the Aggrieved Employees pursuant to the terms of the
17 Settlement.

18 i) The Court further orders, adjudges and decrees that upon the Effective Date, the
19 Aggrieved Employees and PAGA Counsel, fully release and forever discharge MOC Products
20 Company, Inc. ("Defendant"), and each of its former and present directors, officers,
21 shareholders, owners, members, attorneys, insurers, reinsurers predecessors, successors, parents,
22 assigns, subsidiaries, joint employers, staffing agencies, and affiliates ("Released Parties") from
23 all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on
24 the PAGA Period facts stated in the Operative Complaint and the PAGA Notice, including for
25 violations of Labor Code 201, 202, 203, 204, 210, 218.5, 226, 226.3, 226.4, 226.7, 510, 512, 558,
26 558.1, 1174, 1174.5, 1182.12, 1185, 1194, 1194.2, 1197, 1198, 1199, 2698, 2699 *et seq.*, 2751,
27 2802, and 2810.5. ("Released Claims").

28 ///

1 j) Pursuant to California Code of Civil Procedures section 664.6 the Court shall have and
2 retain continuing jurisdiction over this action and the Parties including after the entry of this
3 Order, to the fullest extent necessary to interpret, enforce and effectuate the terms and intent of
4 the Settlement and this Order.

5 k) The Settlement Administrator is to file a declaration no later than January 9, 2026 to
6 confirm that the distribution of funds to Aggrieved Employees is complete.

7 **IT IS SO ORDERED.**



9 *Carolyn B. Kuhl*

10 Dated: 02/13/2025

Carolyn B. Kuhl / Judge

Hon. Carolyn B. Kuhl
Judge of the Superior Court

EXHIBIT B

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Attorneys for Plaintiff FRANCISCO MORALES
on behalf of himself and on behalf of all other
aggrieved employees

(Additional counsel listed on next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

FRANCISCO MORALES, on behalf of
himself and on behalf of all other aggrieved
employees,

Plaintiff,

vs.

MOC PRODUCTS COMPANY, INC., a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22STCV17634

Hon. Carolyn B. Kuhl

[PROPOSED] FINAL JUDGMENT

[PROPOSED] FINAL JUDGMENT

FILED

Superior Court of California
County of Los Angeles

02/13/2025

David W. Saylor, Executive Officer / Clerk of Court

By: L. McGreene Deputy

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1 The Court, having received and considered the Private Attorneys General Act (“PAGA”)
2 Settlement Agreement (“Settlement”) of Plaintiff Francisco Morales (“Plaintiff”) and Defendant
3 MOC Products Company, Inc. (“Defendant”), approved by this court on February 13, 2025, has
4 entered the Order for approval of the Settlement between Plaintiff on behalf of himself and all other
5 similarly situated employees, and Defendant.

6 There are approximately 130 Aggrieved Employees, defined as a person employed by
7 Defendant in California and classified as a non-exempt employee who worked for Defendant during
8 the PAGA Period from May 22, 2021 to December 4, 2024.

9 The Court has finally approved the allocations of funds from the Gross Settlement Amount,
10 and has found the Settlement to be fair, reasonable, and adequate.

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

12 The Court having entered an Order Granting Approval of the PAGA Settlement filed in this
13 Action hereby enters FINAL JUDGMENT in favor of Plaintiff and the Aggrieved Employees in the
14 amount of One Hundred Seventy Thousand Dollars and Zero Cents (\$170,000.00).

15 Without affecting the finality of this Judgment, pursuant to California Code of Civil
16 Procedures section 664.6 the Court shall retain continuing jurisdiction over this action and the
17 parties, including all Aggrieved Employees and over all matters pertaining to the implementation
18 and enforcement of the terms of the Settlement. Except as provided to the contrary herein, any
19 disputes or controversies arising with respect to interpretation, enforcement or implementation of the
20 Settlement shall be presented by motion to the Court for resolution.

21 This Judgment is intended to be a final disposition of the above-captioned action in its
22 entirety and is intended to be immediately appealable. Subject to the Court’s continuing jurisdiction
23 as set forth above, the Court directs the Clerk of the Court to enter Judgment.

24 **IT IS SO ORDERED.**

25
26 **DATED:** 02/13/2025 _____



A handwritten signature in black ink that reads "Carolyn B. Kuhl".

Carolyn B. Kuhl / Judge

**HON. CAROLYN B. KUHL
JUDGE OF THE SUPERIOR COURT**

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I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 450 N Brand Blvd., Suite 840, Glendale, CA 91203.

Efthalia S. Rofos
trofos@ohaganmeyer.com
 Megan Childress
mchildress@ohaganmeyer.com
O'HAGAN MEYER LLC
 4695 MacArthur Court, Suite 900
 Newport Beach, CA 92660

[X] (STATE) I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Kathryn Perez