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Attorneys for Plaintiff and the aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

JERRYAL CULLER, an individual, on behalf
of himself and others similarly situated,

PLAINTIFF,

v.

PLUMMERS, INC. DBA DANIA
FURNITURE; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. C22-01296

[Case Assigned for All Purposes to Hon.
Charles S. Treat in Dept. 12]

[PROPOSED] FINAL JUDGMENT

Date: TBD

Time: TBD

Dept.: 12

Complaint Filed: June 22, 2022

Trial Date: None Set

1 The Motion for Approval of Representative Action Settlement came before this Court, on
2 _____, 2024.

3 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

4 The Court having entered an Order approving the representative action settlement
5 as reflected in the Parties' joint PAGA Settlement Agreement ("Agreement"), judgment is hereby
6 entered in accordance with the terms of the Court's Order.

7 This Judgment hereby incorporates by reference the definitions of the Agreement as though
8 fully set forth herein, and all terms used herein shall have the same meaning as set forth in the
9 Agreement.

10 Consistent with its Order, the Court approves the Maximum Settlement Amount of
11 \$105,000.00.

12 This Action is hereby dismissed in its entirety. All claims in the First Amended Complaint
13 are dismissed with prejudice as to Plaintiff. All PAGA claims in the First Amended Complaint
14 are dismissed with prejudice as to Plaintiff, the State of California and the PAGA Employees. All
15 class claims in the First Amended Complaint are dismissed without prejudice as to the putative
16 class members. Plaintiff, the State of California with respect to employment of PAGA Employees,
17 and all PAGA Employees do and shall be deemed to have fully, finally, and forever released,
18 settled, compromised, relinquished, and discharged any and all of the Released Parties from each
19 and every claim contained in the Released PAGA Claims as described in the Agreement.

20 The Court retains jurisdiction over the parties to enforce the terms of the judgment.

21
22 **DATED:** _____

23 **JUDGE OF THE SUPERIOR COURT**
24
25
26
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28

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On September 4, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] FINAL JUDGMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

LITTLER MENDELSON

Lisa Lin Garcia
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Emily Mertes
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ABRAMSON LABOR GROUP

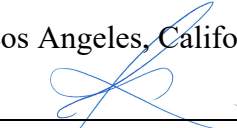
William Zev Abramson
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11846 Ventura Blvd., Suite 100
Studio City, CA 91604

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 4, 2024, at Los Angeles, California.



Kimberly Madrid