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Attorneys for Plaintiff Dolores Chavez, individually and on behalf of all other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

DOLORES CHAVEZ, individually and
on behalf of similarly aggrieved
employees,

Plaintiffs,
v.

WINDSOR FASHIONS, LLC, an active
Delaware Limited Liability Company;
GOTWORX STAFFING, INC., an active
Delaware Corporation; and DOES 1
through 10,

Defendants.

Case No.: 22STCV20119

INDIVIDUAL AND REPRESENTATIVE
ACTION

[Assigned to Hon. Carolyn B. Kuhl
in Dept. SS-12]

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
AND PAYMENT OF ATTORNEYS'
FEES AND COSTS, ADMINISTRATION
COSTS, AND ENHANCEMENT AWARD**

[CONCURRENTLY SUBMITTED WITH
NOTICE OF MOTION AND MOTION;
DECLARATION OF ZORIK
MOORADIAN; DECLARATION OF HAIK
HACOPIAN]

Date: December 3, 2024

Time: 11:00 a.m.

Dept.: SS-12

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[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

1 On December 3, 2024, the Court considered the Motion of Plaintiff Dolores Chavez
2 for approval of the Parties' proposed Private Attorneys General Act ("PAGA") Settlement,
3 and Payment of Attorneys' Fees and Costs, Administration Costs, and Enhancement Award.

4 The Court having read and considered the papers on the motion submitted by
5 Plaintiff's Counsel, having heard the presentation of Plaintiff's Counsel and Defendants'
6 counsel, having reviewed all of the submissions presented with respect to the proposed
7 Settlement, and having determined that the Settlement is fair, adequate, and reasonable, it is
8 hereby ORDERED ADJUDGED, and DECREED that:

9 1. The Settlement, as set forth in the Parties' PAGA Settlement Agreement and
10 Release ("Settlement Agreement"), is in all respects fair, reasonable, and it is approved
11 pursuant to Cal. Lab. Code §2699. Except as expressly set forth herein, the Parties shall
12 effectuate the Settlement Agreement according to its terms. The Settlement Agreement, and
13 every term and provision thereof, shall be deemed incorporated herein as if explicitly set forth
14 and shall have full force of an Order of this Court;

15 2. Pursuant to PAGA, Cal. Lab. Code §§ 2699(1)(2), (1)(4), the Labor Workforce
16 and Development Agency ("LWDA") has been given notice of the Settlement. In particular,
17 on or about the date Plaintiff filed the Motion seeking approval of the Settlement with the
18 Court, Plaintiff submitted the Motion and all supporting documents to the LWDA online as
19 reflected by the Proof of Service filed concurrently with the Motion;

20 3. Aggrieved Employees are defined as: any non-exempt, hourly temporary
21 GotWorx employees assigned to work at a Windsor location in California during the period
22 from June 20, 2021 to October 25, 2024 ("PAGA Period");

23 4. Distribution of the PAGA Settlement Sum of \$275,000.00, is approved in
24 accordance with the Settlement Agreement and on account of disputed and alleged civil
25 penalties, as follows: (a) payment of \$91,666.67 in attorneys' fees to Plaintiff's Counsel; (b)
26 payment of \$10,609.41 in attorneys' costs to Plaintiff's Counsel; (c) payment to CPT Group,
27 Inc., the selected administrator, for administration expenses totaling \$13,000.00; (d) payment

1 to Plaintiff Dolores Chavez totaling \$3,000.00 as an enhancement award; (e) payment to the
2 Labor and Workforce Development Agency (“LWDA”) totaling \$117,542.94, which amount
3 represents 75% of the total PAGA Settlement Sum after attorneys’ fees and costs,
4 administration costs, and enhancement award; and (f) payment of \$39,180.98, which amount
5 represents 25% of the total PAGA Settlement Sum after attorneys’ fees and costs,
6 administration costs, and enhancement award, on a pro-rata basis to all Aggrieved Employees;

7 5. The Notice of Settlement of PAGA Representative Action is approved and
8 shall be disseminated to Aggrieved Employees in accordance with the Settlement Agreement,
9 in English and Spanish;

10 6. Plaintiff is directed to submit a copy of this Order to the LWDA within 10 days
11 of the date of this Order;

12 7. The Court retains exclusive and continuing jurisdiction over this Action for the
13 purposes of supervising, administering, implementing, interpreting, and enforcing this Order,
14 as well as the Settlement.

15
16
17 Dated: _____

By: _____
Honorable Carolyn B. Kuhl
Judge of the Superior Court