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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]*

**NOTICE OF ENTRY OF ORDER
GRANTING APPROVAL
OF PAGA SETTLEMENT**

Action filed: June 20, 2022
Trial Date: Not yet set

**TO THE HONORABLE COURT, PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that, on December 17, 2024, the Order Granting Plaintiff's Motion for Approval of PAGA Settlement, and Payment of Attorneys' Fees and Costs, Administration Costs, and Enhancement Award was entered by the Court, a true and correct copy of which is appended hereto.

DATED: December 17, 2024

MOORADIAN LAW, APC

1 By: /s/Haik Hacopian
2 **Zorik Mooradian,**
3 **Haik Hacopian,**
4 Attorneys for Plaintiff, individually and on
5 behalf of other persons similarly situated and
6 similarly aggrieved employees
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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

FILED
Superior Court of California
County of Los Angeles

12/17/2024

David W. Slayton, Executive Officer / Clerk of Court

By: L. M'Greené Deputy

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;
The fee award is reasonable in light of the total benefit obtained for the LWDA and the aggrieved employees.

7 5. The Notice of Settlement of PAGA Representative Action (a true and correct
8 copy of which is appended hereto as Exhibit "A") is approved and shall be disseminated to
9 Aggrieved Employees in accordance with the Settlement Agreement, 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.



Carolyn B. Kuhl

15 12/17/2024
16 Dated: _____

17 By: Carolyn B. Kuhl / Judge
18 Honorable Carolyn B. Kuhl
19 Judge of the Superior Court
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Eligible Employee
Address
Address

Approval of the Settlement

anything wrong.

could have been, alleged based on the facts contained in the Operative Complaint and the

1 PAGA Notice filed in the Action, including but not limited to, claims based on alleged
2 violations of Labor Code section 2699, and claims for (1) failure to pay minimum wages, (2)
3 failure to pay overtime wages, (3) failure to provide meal periods, (4) failure to permit provide
4 rest breaks, (5) failure to pay wages, (6) failure to timely pay wages at termination/separation;
5 (7) failure to provide accurate compliant itemized wage statements, (8) failure to reimburse
6 employees for all business related expenses, (9) failure to pay all wages upon separation of
7 employment, and (10) violations of the Unfair Business Practices Act Business & Professions
8 Code section 17200. (“PAGA Released Claims”).

9 “Released Parties” refers to Defendants Windsor LLC and GotWorx, Staffing Inc. and
10 each of their former and present directors, officers, shareholders, owners, members, attorneys,
11 insurers, predecessors, successors, assigns, subsidiaries, and affiliates.

12 **THIS SETTLEMENT DOES NOT RELEASE ANY WAGE CLAIMS WHICH**
13 **YOU MAY HAVE**

14 By an Order dated **Approval Date**, the Superior Court of California approved the
15 Settlement of the Released Claims. By approving the Settlement, the Court did not decide in
16 favor of either Plaintiff or Defendants.

17 According to Defendant GotWorx’s records, you are an Aggrieved Employee and are
18 therefore entitled to a share of the Settlement based upon the Court-approved allocation.
19 Enclosed with this Notice is your settlement check for your share. Your share is determined
20 by the number of pay periods you worked during the PAGA Period relative to the total of pay
21 periods worked by all Aggrieved Employees. Based on the total number of pay periods, the
22 value of a pay period calculates to [VALUE], which multiplied by your [NUMBER] pay
23 periods, equals your share.

24 The settlement check shall remain valid for one hundred eighty (180) days. Thereafter,
25 the settlement check shall be canceled, and funds associated with your check shall be
26 transmitted to the California Controller’s Unclaimed Property Fund to be held in your name
27 (sco.ca.gov).

28 Please Note: One hundred percent (100%) of the payment you are receiving in
connection with the Settlement will be considered penalties reported on IRS Form 1099, and
may be subject to local, state or federal tax withholdings and will be reported to the IRS and
state tax authorities. You should rely on your own tax advisors as to the tax consequences of
your settlement payment. Neither Plaintiff nor Defendants have made any representations or
warranties regarding the taxation of your settlement payment. Nothing in this Notice or any
other communication shall constitute or be construed or relied upon as tax advice.

1 PLEASE DO NOT CALL OR WRITE THE COURT OR OFFICE OF THE CLERK TO
2 ASK QUESTIONS ABOUT THE SETTLEMENT. IF YOU HAVE ANY QUESTIONS,
3 YOU MAY CALL OR WRITE TO THE SETTLEMENT ADMINISTRATOR AT:

4 ADMINISTRATOR NAME

5 WEBSITE

6 Phone:

PROOF OF SERVICE

22STCV20119

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action, my business address is 24007 Ventura Blvd., Suite 210, Calabasas, Calabasas, CA 91302.

On **December 17, 2024**, I served on the parties of record in this action the foregoing document(s) described as:

NOTICE OF ENTRY OF ORDER GRANTING APPROVAL OF PAGA SETTLEMENT

on the parties to this action by placing them in a sealed envelope(s) addressed as follows:

Michael D. Thomas
(Michael.Thomas@jacksonlewis.com)
Gabriel A. Mendoza
(Gabriel.Mendoza@jacksonlewis.com)
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Attorneys for Defendant GOTWORX STAFFING, INC.

Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, CA 95814

(Filed online at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>)

1 ☒ **BY E-MAIL** – Based on a court order or agreement of the parties to accept service
2 by electronic transmission, I caused the above document(s) to be sent to the persons(s) at
3 the e-mail addresses listed on the service list above. I did not receive, within a reasonable
4 time after the transmission, any electronic message or other indication that the transmission
was unsuccessful.

5 ☒ **STATE** – I declare under penalty of perjury under the laws of the “State of
6 California that the above is true and correct.

7 Executed on **December 17, 2024** at Calabasas, California.

8 /s/Haik Hacopian
9 Haik Hacopian