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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

JEFFREY MACIAS, an individual, JOVESA NAQARASE, an individual. on behalf of themselves and all others similarly situated, the general public, Plaintiff, vs. HALLMARK AVIATION SERVICES, L.P., a California Limited Partnership and DOES 1 through 10, inclusive, Defendants.	CASE NO.: 25STCV12975 **[PROPOSED] ORDER AND JUDGMENT**

[PROPOSED] ORDER AND JUDGMENT

Having considered the Parties' PAGA Settlement Agreement (the "Settlement"), the documents and evidence in support thereof; and recognizing the disputed factual and legal issues involved in this case, the risks of further prosecution, the substantial benefits to be received by Plaintiffs Jeffrey Macias and Jovesa Naqarase ("Plaintiffs"), the State of California, and the Aggrieved Employees pursuant to the Settlement; and the fair, reasonable, and adequate nature of the settlement obtained as a result of good faith arm's-length negotiations between the Parties, the Court hereby makes a final ruling that the Settlement is approved pursuant to Labor Code section 2699(1). Good cause appearing therefore, the Court hereby GRANTS Approval of the Settlement of Claims under the Private Attorneys General Act between Plaintiffs and Defendant HALLMARK AVIATION SERVICES, L.P. ("Defendant") and ORDERS as follows:

1. The "Aggrieved Employees" shall be defined as all persons employed by Defendant as an hourly-paid or non-exempt employee in California at any time during the PAGA Release Period (March 12, 2025 through April 30, 2026).

2. The Court hereby approves the Settlement as fair, reasonable, and adequate, and directs the Parties to effectuate the Settlement according to its terms.

3. Defendants shall fund the Gross Settlement Amount of $285,000.00 with the Settlement Administrator no later than 30 calendar days after the Court has entered an Order granting approval of the Settlement and final judgment.

4. The Court hereby approves, as to the form and content, the Notice to Aggrieved Employees attached as Exhibit 9 to the Declaration of Roman Otkupman.

5. The Court hereby appoints CPT Group, Inc. ("CPT Group") as the Administrator.

6. The Administrator is directed to mail the Individual PAGA Payments and the Notice to Aggrieved Employees within 30 calendar days after receipt of the Gross Settlement Amount, pursuant to the terms of the Settlement.

7. The Court finds that attorneys' fees in the amount of one-third (1/3) of the Gross Settlement Amount ($95,000.00) for PAGA Counsel, and reimbursement of litigation costs in the amount of $24,949.43 are fair, reasonable, and adequate, and orders the Administrator to distribute

these payments to PAGA Counsel as provided for in the Settlement.

9. The Court orders that the Administrator shall be paid $9,500.00 for all of its work done and to be done until the completion of this matter, pursuant to the Administrator's bid attached as Exhibit 8 to the Declaration of Roman Otkupman.

10. The Court finds that the Enhancement Payments to Named Plaintiffs Jeffrey Macias and Jovesa Naqarase in the amount of $10,000.00 each are fair and reasonable and orders the Administrator to distribute this payment as provided for in the Settlement.

11. The Court finds that the amount of $88,107.87, representing 65% of the $135,550.57 allocated as PAGA civil penalties under the Settlement, to be paid to the California Labor and Workforce Development Agency ("LWDA") as provided for by the Settlement, is fair, adequate, and reasonable, and orders that payment be made to the LWDA in accordance with the terms of the Settlement. The remaining amount of $47,442.70, representing 35% of the PAGA civil penalties under the Settlement shall be distributed amongst the Aggrieved Employees pursuant to the Settlement.

12. The Court approves the scope of the release as set forth in the Settlement. Upon the Effective Date and the complete funding of the Gross Settlement Amount by Defendant, all Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, administrators, successors and assigns, the Released Parties from all claims for PAGA Penalties that were alleged, or reasonably could have been alleged, based on the facts and allegations in the Operative Complaint that are alleged to have occurred during the PAGA Period and the PAGA Notices.

13. Upon entry of this Order, the Court hereby enters judgment pursuant to the terms of the Settlement and all terms of the Settlement are hereby incorporated into this Order and Judgment.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Dated: _____

_____
HON. WILLIAM F. HIGHBERGER
JUDGE OF THE SUPERIOR COURT