

PIMENTEL LAW

Gabriel J. Pimentel, Esq. (SBN 265328)
gpimentel@pimentellawfirm.com
30 N. Raymond Ave., Ste. 210
Pasadena, California 91103
Tel: (626) 765-6505
Fax: (626) 628-3036

Attorney for Plaintiff,
ALFREDO BANUELOS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, WEST DISTRICT**

ALFREDO BANUELOS, an individual,

Plaintiff,

vs.

JEFFREY W. STEINBERGER, an individual,
JEFFREY W. STEINBERGER, A LAW
CORPORATION, a California corporation,
and DOES 1 through 20 inclusive,

Defendants.

CASE NO. SC125851

Assigned to Hon. Mitchell L. Beckloff in Dept. M

**JOINT STIPULATION AND [PROPOSED]
ORDER APPROVING PAGA SETTLEMENT**

Action Filed: May 13, 2016
Trial Date: May 8, 2017

TO THE COURT, TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

IT IS HEREBY STIPULATED by and between Plaintiff Alfredo Banuelos and Defendants Jeffrey W. Steinberger and Jeffrey W. Steinberger, a law corporation, by and through their respective attorneys of record, as follows:

RECITALS

1. WHEREAS on May 13, 2016, Plaintiff filed a wrongful termination action, alleging disability discrimination in violation of the FEHA, failure to prevent discrimination in violation of the FEHA, failure to accommodate in violation of the FEHA, failure to engage in the interactive process in violation of the FEHA, retaliation in violation of the FEHA, wrongful termination in

1 violation of public policy, declaratory relief, failure to provide itemized wage statements and civil
2 penalties under California Labor Code § 2699, et seq. (Private Attorney General Act);

3 2. WHEREAS Plaintiff's PAGA claim alleged that Defendants committed pay stub
4 violations with respect to 11 employees, including Plaintiff, during Plaintiff's 9-month period of
5 employment;

6
7 3. WHEREAS on November 10, 2016, after a 9-hour mediation with Mr. Steve Paul,
8 Esq., the parties reached a confidential settlement of the entire action, and allocated \$1,500.00 to
9 PAGA penalties;

10 4. WHEREAS 75% of the PAGA penalties (\$1,125.00) will be paid to the Labor &
11 Workforce Development Agency and the remaining 25% of the penalties (\$375.00) will be
12 distributed to the 10 current and former non-exempt employees.
13

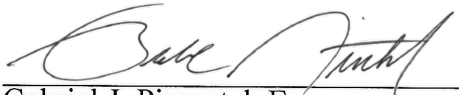
14 **STIPULATION**

15 IS IT HEREBY STIPULATED THAT \$1,500.00 from Plaintiff's confidential settlement
16 will be allocated to PAGA penalties, \$1,125.00 of which will be paid directly to the Labor &
17 Workforce Development Agency, and \$375.00 of which will be paid to the 11 current and former
18 employees who were allegedly subjected to the pay stub violations.
19

20 **PIMENTEL LAW**

21 Dated: November 14, 2016

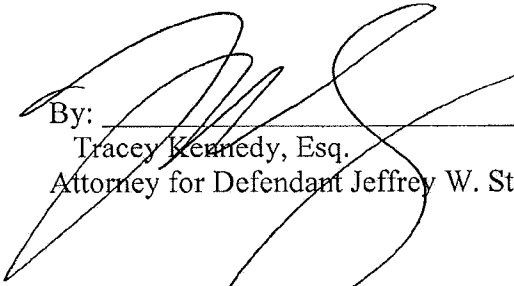
22
23 By:



Gabriel J. Pimentel, Esq.
Attorney for Plaintiff
ALFREDO BANUELOS

1 Dated: November 14, 2016

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

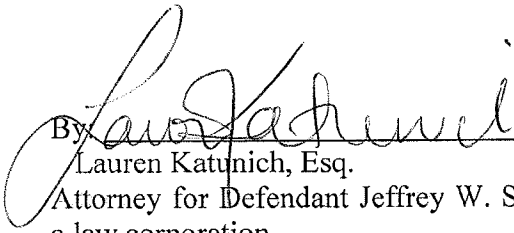
2
3
4 By: 

5 Tracey Kennedy, Esq.

6 Attorney for Defendant Jeffrey W. Steinberger

7
8 Dated: November 14, 2016

LATHROP & GAGE LLP

9
10
11 By: 

12 Lauren Katunich, Esq.

13 Attorney for Defendant Jeffrey W. Steinberger,
14 a law corporation

15 **[PROPOSED] ORDER**

16 Having considered the stipulation of the parties, and good cause appearing, the Court hereby
17 approves the parties' settlement of Plaintiff's PAGA action to the 11 current and former non-exempt
18 employees.
19

20
21
22 DATED _____

THE HONORABLE MITCHELL L. BECKLOFF

1
2
3 **PROOF OF SERVICE**

4 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

5 I am employed in the County of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action. My business address is 30 N. Raymond Ave., Ste. 210
7 Pasadena, CA 91103. On November 14, 2016, I served the foregoing document described as
8 **JOINT STIPULATION AND [PROPOSED] ORDER APPROVING PAGA SETTLEMENT**
9 on the interested parties in this action as follows:

10 ☒ By placing true copies enclosed in a sealed envelope addressed to each addressee as
11 follows:

12 Lathrop & Gage LLP
13 Ms. Lauren Katunich, Esq.
14 1888 Century Park East, Ste. 1000
15 Los Angeles, CA 90067

*Attorney for Defendant Jeffrey W.
Steinberger a law corporation*

16 Michael St. Denis, PC
17 Mr. Michael St. Denis, Esq.
18 500 Silver Spur Rd., Ste. 204
19 Rancho Palos Verdes, California 90275

*Attorney for Defendant Jeffrey W.
Steinberger*

20 Sheppard, Mullin, Richter & Hampton LLP
21 Ms. Tracey A. Kennedy, Esq.
22 333 S. Hope St., 43rd Floor
23 Los Angeles, California 90071

*Attorney for Defendant Jeffrey W.
Steinberger*

24 ☒ BY MAIL:

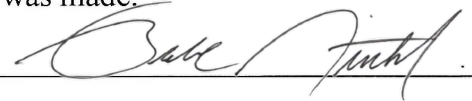
25 ☒ I deposited each envelope in the mail at Pasadena, California, with postage thereon
26 fully prepaid.

27 ☐ I am "readily familiar" with the firm's practice for collection and processing
28 correspondence for mailing with the U.S. Postal Service. Under that practice, and in
the ordinary course of business, correspondence would be deposited with the U.S.
Postal Service on that same day with postage thereon fully prepaid at our business
address in Pasadena, California. Each of the above envelopes was sealed and placed
for collection and mailing on that date following ordinary business practices.

☒ STATE I declare under penalty of perjury under the laws of the State of
California that the foregoing is true and correct.

☐ FEDERAL I declare that I am employed in the office of a member of the bar of
this Court at whose direction the service was made.

29 Gabriel J. Pimentel



Executed on November 14, 2016 at Pasadena, California.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28