

3/24/2026 9:42:13 AM

Clerk of the Superior Court
By T. Automation ,Deputy Clerk

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Attorneys for Plaintiff Salvador Cruz

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

SALVADOR CRUZ, on behalf of others
similarly situated and the State of California
under the Private Attorneys General Act,

Plaintiff,

vs.

KHANNA ENTERPRISES VI LP;
KHANNA ENTERPRISES II LIMITED
PARTNERSHIP; KHANNA
ENTERPRISES, LTD-III LP; KHANNA
ENTERPRISES IV LIMITED
PARTNERSHIP; KHANNA ENTERPRISES
LTD., A LIMITED PARTNERSHIP;
KHANNA ENTERPRISES V LIMITED
PARTNERSHIP; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 25CU014533C

*Hon. Loren Freestone
Dept. 64*

**NOTICE OF ENTRY OF ORDER
GRANTING APPROVAL OF PAGA
ACTION SETTLEMENT AND
ATTORNEYS' FEES AND COSTS AND
ENTERING JUDGMENT**

Action Filed: March 19, 2025

1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD, PLEASE
2 TAKE NOTICE THAT:

- 3 1. On March 13, 2026, at 10:30 a.m. in this Department, the Court entered the Order Granting
4 Approval of PAGA Action Settlement and Attorneys' Fees and Costs and Entering Judgment
5 attached hereto as Exhibit 1.
- 6 2. The Judge confirmed the Court's Tentative Ruling attached hereto as Exhibit 2.
- 7 3. A conformed copy of this Notice will be submitted to the LWDA via its online electronic portal
8 in accordance with Labor Code § 2699(s)(3).
- 9 4. Notice of the Court's final ruling and entry of judgment is hereby provided.

10
11 Respectfully submitted,

12
13 Dated: March 24, 2026

Ferraro Vega Employment Lawyers, Inc.

14
15 

Nicholas J. Ferraro

Lauren N. Vega

Ricardo De Leon

Attorneys for Plaintiff Salvador Cruz

EXHIBIT 1

RECEIVED
2/17/2026 4:37:01 PM

FILED
Clerk of the Superior Court

MAR 13 2026

By: J. Virissimo, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

SALVADOR CRUZ, on behalf of others
similarly situated and the State of California
under the Private Attorneys General Act,

Plaintiff,

vs.

KHANNA ENTERPRISES VI LP;
KHANNA ENTERPRISES II LIMITED
PARTNERSHIP; KHANNA
ENTERPRISES, LTD-III LP; KHANNA
ENTERPRISES IV LIMITED
PARTNERSHIP; KHANNA ENTERPRISES
LTD., A LIMITED PARTNERSHIP;
KHANNA ENTERPRISES V LIMITED
PARTNERSHIP; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 25CU014533C

Hon. Loren Freestone
Dept. 64

**~~[PROPOSED]~~ ORDER GRANTING
APPROVAL OF PAGA ACTION
SETTLEMENT AND ATTORNEYS' FEES
AND COSTS AND ENTERING JUDGMENT**

Motion for PAGA Approval Hearing:

Date: March 13, 2026

Time: 10:30 a.m.

[Filed concurrently with Plaintiff's Notice of
Unopposed Motion and Motion for Approval of
PAGA Action Settlement, Plaintiff's
Memorandum of Points and Authorities,
Declaration of Nicholas J. Ferraro, and
Declaration of Salvador Cruz]

Action Filed: March 19, 2025

1 This matter came up for hearing on March 13, 2026, at 10:30 a.m. in Department 64 of the
2 above-captioned Court, the Honorable Loren Freestone presiding, on Plaintiff's Motion for Approval
3 of PAGA Action Settlement and Attorneys' Fees and Costs.

4 Having received and considered the Motion and supporting Memorandum of Points and
5 Authorities, Declaration of Nicholas J. Ferraro (and its exhibits), Declaration of Salvador Cruz,
6 including the PAGA Settlement Agreement ("Settlement"), the Court makes the following
7 determinations and orders:

8 Plaintiff's PAGA notice, Plaintiff's Complaint, and the Parties' fully executed long form PAGA
9 Settlement Agreement are incorporated by reference. Terms used in this Order are derived from the
10 PAGA Settlement Agreement. The PAGA Period is defined as August 19, 2024, through September
11 14, 2025. The PAGA Members means "all individuals currently or formerly employed by Defendant
12 in California as hourly, non-exempt employees during the PAGA Period [August 19, 2024, through
13 September 14, 2025]".

14 Plaintiff's Motion for Approval of PAGA Action Settlement and Attorneys' Fees and Costs is
15 **GRANTED** and approved pursuant to California Labor Code section 2699(s)(2). After the attorneys'
16 fees, individual representative service payment, costs, and administrator's expenses are deducted from
17 the Gross Settlement Amount, the total PAGA Penalties Amount is \$36,165.12, of which 65%
18 (\$23,507.33) shall be distributed to the LWDA and the remaining 35% (\$12,657.79) shall be distributed
19 to the aggrieved employees as their share of PAGA penalties.

20 Accordingly, the \$100,000 gross settlement shall be distributed as follows:

- 21 1. \$23,507.33 to the Labor and Workforce Development Agency for PAGA penalties;
- 22 2. \$12,657.79 to the PAGA Employees;
- 23 3. \$10,000.00 to Plaintiff Salvador Cruz;
- 24 4. \$33,330.00 to Plaintiff's counsel for attorneys' fees;
- 25 5. \$13,004.88 to Plaintiff's counsel for costs; and
- 26 6. \$7,500.00 to the Settlement Administrator (any remaining unused fees will be shared with the
27 PAGA members).

1 Plaintiff, Defendant, and the Settlement Administrator are ordered to carry out the terms of the
2 settlement in accordance with the Settlement Agreement.

3 Upon the Effective Date of this Order, Defendant and the Released Parties shall be entitled to a
4 full and complete release of the Released Claims from the PAGA Members and a full and complete
5 release from Plaintiff. The "Released Claims" for the PAGA Members are the PAGA claims alleged,
6 and/or could have been alleged, arising out of the facts alleged in Plaintiff's Complaint and PAGA
7 Notice during the PAGA Period, including, without limitation, penalties predicated on the underlying
8 alleged violations for civil penalties under PAGA (Labor Code §§ 2698 *et seq.*).

9 This Settlement (including this Order) cannot be used, directly or indirectly, to introduce, use,
10 or admit in this case or in any other judicial, arbitral, administrative, investigative or other forum or
11 proceeding, as purported evidence of any violation of any federal, state, or local law, statute, ordinance,
12 regulation, rule or executive order (i.e., evidence of a "first" or "initial" violation), or any liability,
13 obligation, or duty at law or in equity, or for any other purpose. This Settlement (including this Order)
14 shall not be construed to be an admission by Defendant of any liability or wrongdoing as to Plaintiff,
15 the PAGA Members, or any other person, and Defendant specifically disclaims any such liability or
16 wrongdoing.

17 Without affecting the finality of this Order or the entry of judgment in any way, the Court retains
18 jurisdiction on all matters relating to the interpretation, administration, implementation, and
19 enforcement of this Order and the Settlement.

20 The Court hereby ENTERS JUDGMENT in accordance with the terms of the Settlement, in
21 accordance with this Approval Order and Judgement.

22
23 **IT IS SO ORDERED.**

24
25 Date: 3/13/2026


26 The Honorable Loren Freestone
27 Judge of the Superior Court
28

EXHIBIT 2

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO
CENTRAL COURTHOUSE

TENTATIVE RULINGS - March 12, 2026

HEARING DATE: 03/13/26 HEARING TIME: 10:30AM DEPT.: C-64

JUDICIAL OFFICER: FREESTONE, LOREN

CASE NO.:25CU014533C

CASE TITLE: Cruz vs Khanna Enterprises VI LP

CASE TYPE: (U)Other Employment

HEARING TYPE: Motion Hearing

The unopposed motion (ROA # 29) of Plaintiff SALVADOR CRUZ for an order granting approval of PAGA action settlement and attorneys' fees and costs, and entering judgment is GRANTED.

The settlement is "fair, reasonable, and adequate in view of PAGA's purposes to remediate present labor law violations, deter future ones, and to maximize enforcement of state labor laws." Moniz v. Adecco USA, Inc. (2021) 72 Cal.App.5th 56, 77.

The court approves the following final approval breakdown:

- Gross Settlement (Non-Revisionary) - \$100,000.00
- Attorney Fees - \$33,330 (33.33% of Gross Settlement)
- Litigation Costs - \$13,004.88
- Service Award to PAGA Representative - \$10,000.00
- Settlement Administration Costs not to exceed - \$7,500.00
- LWDA Payment – \$23,507.33 (65% of \$36,165.12 PAGA payment)

There are approximately 151 PAGA group members with a combined 3,001 pay periods. Given the limited nature of the alleged violations, the PAGA payments will be sufficiently meaningful and not trivial. Therefore, the settlement is approved in full, and the settlement proceeds will be disbursed to the PAGA members.

The Court will execute the proposed order and judgment (ROA # 33) at the hearing.