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7 Attorney for the Plaintiff, Joel Lanuza

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**  
10 **SPRING STREET COURTHOUSE**

11 JOEL LANUZA, as representative of the State of  
12 California on behalf of himself and all other  
13 aggrieved employees of Tower Wav LLC,

14 Plaintiff,

15 v.

16 TOWER WAV LLC, a California limited  
17 liability company, and DOES 1 through 20,  
18 inclusive,

19 Defendants.

Case No. 25STCV26177

**NOTICE OF ENTRY OF JUDGMENT  
AND ORDER GRANTING PAGA  
SETTLEMENT AND RELATED PAPERS  
ENTERED AND/OR FILED BY THE  
COURT ON FEBRUARY 24, 2026**

20 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

21 **PLEASE TAKE NOTICE THAT** on February 24, 2026, the following three documents in  
22 the above-captioned action were entered and/or filed by or on behalf of the Honorable Judge Kristin  
23 S. Escalante in Department 2 of the Superior Court of the State of California, County of Los Angeles,  
24 Spring Street Courthouse:

- 25 (1) Notice of Entry of Judgment and Order Granting PAGA Settlement;  
26 (2) Minute Order dated February 24, 2026; and  
27 (3) Order dated February 24, 2026, granting the Parties' Unopposed Motion for an Order  
28 Approving the PAGA Settlement and Entering Judgment Thereon and Plaintiff's

Unopposed Motion for an Order Approving the PAGA Counsel Fees and Litigation  
Expenses Payments.

True and correct, file-stamped copies of the aforementioned documents are attached hereto as  
Group Exhibit 1.

Dated: February 24, 2026

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

By:



Daniel V. Santiago, Esq.  
Attorney for Plaintiff, Joel Lanuza

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**NOTICE OF ENTRY OF JUDGMENT AND ORDER GRANTING PAGA SETTLEMENT  
AND RELATED PAPERS ENTERED AND/OR FILED BY THE COURT  
ON FEBRUARY 24, 2026**

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## **GROUP EXHIBIT 1**

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SUPERIOR COURT OF CALIFORNIA<br/>COUNTY OF LOS ANGELES</b>                                                                                                                                               |  | Reserved for Clerk's File Stamp                                                                                                                                                   |
| COURTHOUSE ADDRESS:<br>Spring Street Courthouse<br>312 North Spring Street, Los Angeles, CA 90012                                                                                                           |  | <b>FILED</b><br>Superior Court of California<br>County of Los Angeles<br><b>02/24/2026</b><br>David W. Slayton, Executive Officer / Clerk of Court<br>By: <u>A. Garcia</u> Deputy |
| PLAINTIFF(S):<br>Joel Lanuza                                                                                                                                                                                |  |                                                                                                                                                                                   |
| DEFENDANT(S):<br>Tower Wav LLC, a California limited liability company                                                                                                                                      |  |                                                                                                                                                                                   |
| <b>NOTICE OF ENTRY OF: <input checked="" type="checkbox"/> JUDGMENT    <input type="checkbox"/> DISMISSAL</b><br><b><input checked="" type="checkbox"/> OTHER ORDER    <input type="checkbox"/> AMENDED</b> |  | CASE NUMBER:<br>25STCV26177                                                                                                                                                       |

TO THE PARTIES AND TO THEIR ATTORNEYS OF RECORD, you are hereby given notice of entry of:

☒ Judgment in the above-entitled matter, entered on 02/24/2026.  
☐ Order of Dismissal in the above-entitled matter, filed on \_\_\_\_\_.  
☒ Order Granting PAGA Settlement filed on 02/24/2026.

☐ Judgment debtor is a natural person, and as provided in Code Civ. Proc., §§ 683.110, 685.010:

\$ \_\_\_\_\_ of this judgment is on a claim related to medical expenses

\$ \_\_\_\_\_ of this judgment is on a claim related to personal debt

David W. Slayton, Executive Officer / Clerk of Court

Dated: 02/24/2026

By A. Garcia  
Deputy Clerk

**NOTICE OF ENTRY OF JUDGMENT / DISMISSAL / ORDER**

|                                                                                                            |                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p align="center"><b>SUPERIOR COURT OF CALIFORNIA<br/>COUNTY OF LOS ANGELES</b></p>                        | <p align="center">FOR COURT USE ONLY</p><br><br><br><p align="center"><b>FILED</b><br/>Superior Court of California<br/>County of Los Angeles<br/><b>02/24/2026</b><br/>David W. Slayton, Executive Officer / Clerk of Court<br/>By: <u>A. Garcia</u> Deputy</p> |
| <p>COURTHOUSE ADDRESS:<br/>Spring Street Courthouse<br/>312 North Spring Street, Los Angeles, CA 90012</p> |                                                                                                                                                                                                                                                                  |
| <p>PLAINTIFF(S)/PETITIONER(S):<br/>Joel Lanuza</p>                                                         |                                                                                                                                                                                                                                                                  |
| <p>DEFENDANT(S)/RESPONDENT(S):<br/>Tower Wav LLC, a California limited liability company</p>               |                                                                                                                                                                                                                                                                  |
| <p align="center"><b>CLERK'S CERTIFICATE OF SERVICE<br/>BY ELECTRONIC SERVICE</b></p>                      | <p>CASE NUMBER:<br/><br/>25STCV26177</p>                                                                                                                                                                                                                         |

I, David W. Slayton, Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein and that on this date I served the

**Notice of Entry of Judgment / Dismissal / Other Order**

upon each party or counsel of record in the above entitled action by electronically serving to the party or parties at the electronic address as listed below:

**"Santiago, Daniel V." <dvs@dvslawoffices.com>**  
**"Gilbert, Sarah Alexis" <sagilbert@duanemorris.com>**

The electronic transmission originated from the Superior Court of California, County of Los Angeles email address [eService-DoNotReply@lacourt.org](mailto:eService-DoNotReply@lacourt.org) at the Spring Street Courthouse, 312 North Spring Street, Los Angeles, CA 90012.

Dated: 02/24/2026

David W. Slayton, Executive Officer / Clerk of Court

By: A. Garcia  
Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

Central District, Spring Street Courthouse, Department 2

**25STCV26177**

**JOEL LANUZA vs TOWER WAV LLC**

February 24, 2026

8:30 AM

Judge: Honorable Kristin S. Escalante

Judicial Assistant: Armando Garcia

Courtroom Assistant: R. Luna

CSR: None

ERM: None

Deputy Sheriff: None

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**APPEARANCES:**

For Plaintiff(s): Daniel V. Santiago

For Defendant(s): Via LACourtConnect Sarah Alexis Gilbert by Jennifer A. Kearns

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**NATURE OF PROCEEDINGS:** Hearing on Motion for Order Plaintiff's Unopposed Motion for an Order Approving the PAGA Counsel Fees and Litigation Expenses Payments (CRS # 030490585274); Case Management Conference; Hearing on Motion for Order Approving the PAGA Settlement and Entering Judgment Thereon (CRS # 564979995790)

The above-captioned matters are called for hearing.

The Court has read and considers the moving papers in support of the above-captioned motions.

The issues are discussed.

After discussion, the Court rules as follows:

The Notice of Joint Motion and Joint Motion for an Order Approving the PAGA Settlement and Entering Judgment Thereon filed by Joel Lanuza, Tower Wav LLC, a California limited liability company on 12/24/2025 and Notice of Plaintiff's Unopposed Motion and Plaintiff's Unopposed Motion for an Order Approving the PAGA Counsel Fees and Litigation Expenses Payments filed by Joel Lanuza on 12/26/2025 are Granted.

The Order entering judgment is signed and filed on this date.

The Case Management Conference is placed off-calendar.

Status Conference Re: Proof of Distribution of Funds is scheduled for 05/29/2026 at 08:30 AM in Department 2 at Spring Street Courthouse.

Moving party is directed to give notice.

Electronically Received 12/24/2025 02:25 PM

**FILED**  
Superior Court of California  
County of Los Angeles  
**02/24/2026**  
David W. Slayton, Executive Officer / Clerk of Court  
By: A. Garcia Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
SPRING STREET COURTHOUSE**

JOEL LANUZA, as representative of the State  
of California on behalf of himself and all other  
aggrieved employees of Tower Wav LLC,

Plaintiff,

v.

TOWER WAV LLC, a California limited  
liability company, and DOES 1 through 20,  
inclusive,

Defendants.

Case No. 25STCV26177

**~~PROPOSED~~ ORDER GRANTING: (1)  
JOINT MOTION FOR AN ORDER  
APPROVING THE PAGA SETTLEMENT  
AND ENTERING JUDGMENT  
THEREON; AND (2) PLAINTIFF'S  
UNOPPOSED MOTION FOR AN ORDER  
APPROVING THE PAGA COUNSEL  
FEES AND LITIGATION EXPENSES  
PAYMENTS**

**Court Reservation Number: 564979995790**  
Hearing Date: February 17, 2026  
Hearing Time: 8:30 a.m.  
Hearing Location: Department 2  
Complaint Filed: September 8, 2025

**[Filed Concurrently With: (1) the Parties' Joint Motion for an Order Approving the PAGA Settlement and Entering Judgment Thereon and supporting papers (*Notice of Joint Motion, Memorandum of Points and Authorities in support of Joint Motion, and the Declarations of Daniel V. Santiago, Joel Lanuza, Jeffrey D. Johnson, and Juan Fernando Rivera in support of Joint Motion*); and (2) Plaintiff's Unopposed Motion for an Order Approving the PAGA Counsel Fees and Litigation Expenses Payments and supporting papers (*Notice of Plaintiff's Unopposed Motion, Memorandum of Points and Authorities in support of Plaintiff's Unopposed Motion, and the Declaration of Daniel V. Santiago in support of Plaintiff's Unopposed Motion*)]**



1 The Plaintiff, Joel Lanuza, has filed a Representative Action Complaint (hereinafter,  
2 “Complaint”) against the Defendant, Tower WAV LLC, alleging a single cause of action under the  
3 Private Attorneys’ General Act of 2004 (hereinafter, “PAGA”), California Labor Code (hereinafter,  
4 “Labor Code”) §2698 et seq., as representative of the State of California on behalf of himself and all  
5 other aggrieved employees of Defendant. Therein, Plaintiff seeks recovery of PAGA penalties  
6 arising from Defendant’s alleged late payment of gratuities or tips earned in violation of Labor  
7 Code § 351.

8 The Parties have agreed to resolve this action in its entirety to avoid the time and expense of  
9 protracted litigation. To that end, the Parties have executed a PAGA Settlement Agreement  
10 (hereinafter, “Settlement Agreement”) that is based on the Los Angeles Superior Court’s Model  
11 PAGA Settlement Agreement, LASC CIV 298 rev. 02/23 for optional use. In addition, the Parties  
12 have filed a Joint Motion for an Order Approving the PAGA Settlement and Entering Judgment  
13 Thereon (hereinafter, “Joint Motion”). Further, Plaintiff has filed an Unopposed Motion for an  
14 Order Approving the PAGA Counsel Fees and Litigation Expenses Payments (hereinafter,  
15 “Plaintiff’s Unopposed Motion”).

### 16 **ORDER**

17 Having considered the Parties’ Joint Motion and supporting papers filed by Plaintiff’s  
18 counsel (Notice of Joint Motion, Memorandum of Points and Authorities in support of the Parties’  
19 Joint Motion, and the Declarations of Daniel V. Santiago, Joel Lanuza, Jeffrey D. Johnson, and Juan  
20 Fernando Rivera in support of the Parties’ Joint Motion), and good cause appearing for the relief  
21 requested therein,

22 Having also considered Plaintiff’s Unopposed Motion and supporting papers filed by  
23 Plaintiff’s counsel (Notice of Plaintiff’s Unopposed Motion, Memorandum of Points and  
24 Authorities in support of Plaintiff’s Unopposed Motion, and the Declaration of Daniel V. Santiago  
25 in support of Plaintiff’s Unopposed Motion), and good cause appearing for the relief requested  
26 therein,

#### 27 **IT IS HEREBY ORDERED THAT:**

- 28 1. The Court hereby grants the Parties’ Joint Motion and Plaintiff’s Unopposed Motion.

1           2.       The Court hereby approves of the proposed settlement of Plaintiff's PAGA claim  
2 against the Defendant pursuant to the terms and conditions of the parties' PAGA Settlement  
3 Agreement (a true and correct copy of which is attached as Exhibit 1 to the Declaration of Daniel V.  
4 Santiago in support of the Parties' Joint Motion and incorporated herein by reference).

5           3.       The Court hereby appoints CAC Services Group, LLC, as the Administrator to assist  
6 with and facilitate the consummation of the Parties' settlement of Plaintiff's PAGA claim against  
7 the Defendant pursuant to the terms and conditions of the Parties' PAGA Settlement Agreement.

8           4.       Pursuant to the terms and conditions set forth in the Parties' PAGA Settlement  
9 Agreement, the Administrator shall distribute the settlement funds in the Gross Settlement Amount  
10 of Two Hundred Five Thousand Dollars and No Cents (\$205,000.00) as follows:  
11

12                   (a)     the LWDA PAGA Payment (as that term is defined in the PAGA Settlement  
13 Agreement) in the amount of Eighty Five Thousand Fifty Two Dollars and Sixty Eight Cents  
14 (\$85,052.68);  
15

16                   (b)     the Individual PAGA Payments (as that term is defined in the PAGA  
17 Settlement Agreement) in the total amount of Forty Five Thousand Seven Hundred Ninety Seven  
18 Dollars and Fifty Cents (\$45,797.59);  
19

20                   (c)     the Administrator's Expenses Payment (as that term is defined in the PAGA  
21 Settlement Agreement) in the amount of Five Thousand Dollars and No Cents (\$5,000.00);  
22

23                   (d)     the PAGA Counsel Fees Payment in the amount of Sixty Eight Thousand  
24 Three Hundred Thirty Three Dollars and Thirty Three Cents (\$68,333.33); and  
25

26                   (e)     the PAGA Counsel Litigation Expenses Payment (as that term is defined in  
27 the PAGA Settlement Agreement) in the amount of Eight Hundred Sixteen Dollars and Forty Cents  
28 (\$816.40).

1           5.       The Court hereby dismisses with prejudice Plaintiff's PAGA claim against the  
2 Defendant.

3           6.       The Court hereby retains jurisdiction over the Parties, the Action, and the Settlement  
4 solely for purposes of (i) enforcing the Settlement Agreement and/or Judgment, (ii) addressing  
5 settlement administration matters and (iii) addressing such post-Judgment matters as are permitted  
6 by law.  
7

8           7.       The Court hereby instructs the Clerk of the Court to enter final Judgment in  
9 accordance with this Order.

10           **IT IS SO ORDERED.**

11           Dated: 02/24/2026



*Kristin Escalante*

Kristin S. Escalante / Judge  
Judge of the Superior Court of California,  
County of Los Angeles