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

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

13 Plaintiff,

14 v.

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

17 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

20 **[Filed Concurrently With: (1) the Parties' Joint Motion for an Order Approving the PAGA**
21 **Settlement and Entering Judgment Thereon and supporting papers (*Notice of Joint Motion,***
22 ***Memorandum of Points and Authorities in support of Joint Motion, and the Declarations of***
23 ***Daniel V. Santiago, Joel Lanuza, Jeffrey D. Johnson, and Juan Fernando Rivera in support of***
24 ***Joint Motion*); and (2) Plaintiff's Unopposed Motion for an Order Approving the PAGA**
25 **Counsel Fees and Litigation Expenses Payments and supporting papers (*Notice of Plaintiff's***
26 ***Unopposed Motion, Memorandum of Points and Authorities in support of Plaintiff's Unopposed***
27 ***Motion, and the Declaration of Daniel V. Santiago in support of Plaintiff's Unopposed Motion*)]**
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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:
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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);
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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 (c) the Administrator's Expenses Payment (as that term is defined in the PAGA
20 Settlement Agreement) in the amount of Five Thousand Dollars and No Cents (\$5,000.00);
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22 (d) the PAGA Counsel Fees Payment in the amount of Sixty Eight Thousand
23 Three Hundred Thirty Three Dollars and Thirty Three Cents (\$68,333.33); and

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

Judge of the Superior Court of California,
County of Los Angeles