

APR 14 2025

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

AEGIS LAW FIRM, PC

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Attorneys for Plaintiff Phetsamone Solis,
individually and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

PHETSAMONE SOLIS, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

PIONEER HOMECARE INC; and DOES 1
through 20, inclusive,

Defendants.

Case No. 30-2022-01275365-CU-OE-CXC

*Assigned for all purposes to
Hon. William D. Claster
Dept. CX101*

**[PROPOSED] ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND ENTERING
JUDGMENT**

Date: April 11, 2025
Time: 9:00 a.m.
Dept: CX101

1 The Court has received and considered the joint stipulation of Plaintiff Phetsamone Solis,
2 as an individual, and on behalf of the people of the State of California and as an "aggrieved
3 employee" acting as a private attorney general under the Labor Code Private Attorneys General
4 Act of 2004, § 2699, *et seq.* ("PAGA") and Defendant Pioneer Homecare Inc in the above-
5 captioned action.

6 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

7 The Judgment incorporates by reference the definitions in the PAGA Settlement
8 Agreement (the "Settlement"), a copy of which is attached as Exhibit 1 to the Declaration of
9 Jessica L. Campbell in Support of Motion for Approval of PAGA Settlement, and all terms
10 defined therein shall have the same meaning as set forth in the Settlement.

11 The Court hereby approves the Parties' proposed Settlement and hereby enters FINAL
12 JUDGMENT based on the terms set forth in the Parties' Settlement in favor of Plaintiff and the
13 Aggrieved Employees in the Gross Settlement Amount of \$240,000.00. Of this, \$72,000 (30% of
14 the GSA) is awarded as attorney fees paid to Plaintiff's Counsel, \$15,166.49 is awarded as costs
15 paid to Plaintiff's Counsel, \$2,500.00 is awarded to Plaintiff as a PAGA Representative Service
16 Payment, and \$5,750.00 is awarded as administrative costs paid to the Settlement Administrator.
17 Of the remaining Net Settlement Amount (\$144,583.51), 75% (\$108,437.63) shall be paid to the
18 Labor and Workforce Development Agency and 25% (\$36,145.88) shall be paid to the Aggrieved
19 Employees.

20 The Court hereby approves, as to form and content, the notice to be distributed to the
21 PAAGA Employees, attached to the Settlement as Exhibit A. All Individual Settlement Checks
22 will expire 180 days after the initial mailing. Any uncashed funds shall be transmitted to the State
23 Controller's Office Unclaimed Property Fund in the name of each Aggrieved Employee whose
24 check is voided.

25 ~~A Final Compliance Hearing is set for August 28, 2026 at 9:00 a.m. before this Court.~~
26 ~~The administrator is to file a declaration no later than five court days in advance to confirm that~~
27 ~~the distribution of funds is complete, including any distribution to the State Controller.~~

1 The administrator is to file a declaration no later than January 30, 2026 to confirm that the
2 distribution of funds to aggrieved employees is complete. Upon receipt of the administrator's
3 declaration, the Court will determine whether further briefing or a hearing is necessary.
4

5 This Judgment is intended to be a final disposition in its entirety of the above captioned
6 action. Without affecting the finality of this judgment in any way, the Court retains jurisdiction of
7 all matters relating to the interpretation, administration, implementation, effectuation, and
8 enforcement of the Settlement pursuant to C.C.P. § 664.6.

9 IT IS SO ORDERED.

10
11 Dated: 4-14-25

Will D. Claster

12 Hon. William D. Claster

13 Judge of the Superior Court
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1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, am employed in the County of Orange, State of California. I am over
3 the age of 18 and not a party to the within action; am employed with Aegis Law Firm PC and
4 my business address is 9811 Irvine Center Drive, Suite 100, Irvine, California 92618.

5 On April 10, 2025, I served the foregoing document entitled:

6 [PROPOSED] ORDER GRANTING MOTION FOR APPROVAL OF PAGA
7 SETTLEMENT AND ENTERING JUDGMENT

8 on all the appearing and/or interested parties in this action by delivering ☐ the original ☒ a true
9 copy thereof on the party(ies) addressed below as follows:

10 Noell Rice

11 Brian Sinclair

12 Maria Lee

13 **RUTAN & TUCKER, LLP**

14 18575 Jamboree Road, 9th Floor

15 Irvine, CA 92612

16 Telephone: 714.641.5100

17 Facsimile: 714.641.3432

18 nrice@rutan.com

19 bsinclair@rutan.com

20 mlee@rutan.com

21 *Attorneys for Defendant:*

22 PIONEER HOMECARE INC.

23 ☐ **(BY MAIL)** I am readily familiar with the firm's practice of collection and processing
24 correspondence for mailing. Under that practice it would be deposited with the U.S.
25 Postal Service on that same day with postage thereon fully prepaid at Irvine, California
26 in the ordinary course of business. I am aware that on motion of the party served, service
27 is presumed invalid if postage cancellation date or postage meter date is more than one
28 day after date of deposit for mailing this affidavit. (*Cal Code Civ. Proc.* § 1013(a); *Fed.*
R. Civ. Proc. 5(a); *Fed. R. Civ. Proc.* 5(c).)

29 ☐ **(BY OVERNIGHT MAIL)** I am personally and readily familiar with the business
30 practice of Aegis Law Firm PC for collection and processing correspondence for
31 overnight delivery, and I caused such document(s) described herein to be deposited for
32 delivery to a facility regularly maintained Federal Express for overnight delivery. (*Cal*
Code Civ. Proc. § 1013(c); *Fed. R. Civ. Proc.* 5(c).)

33 ☒ **(BY ELECTRONIC TRANSMISSION)** I caused said document(s) to be served via
34 electronic transmission via the above listed email addresses on the date below. (*Cal.*
Code Civ. Proc. § 1010.6(6); *Fed. R. Civ. Proc.* 5(b)(2)(E); *Fed. R. Civ. Proc.* 5(b)(3).)

35 ☐ **(BY PERSONAL SERVICE)** I delivered the foregoing document by hand delivery to
36 the addressed named above. (*Cal Code Civ. Proc.* § 1011; *Fed. R. Civ. Proc.*
37 5(b)(2)(A).)

38 ///

39 ///

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

3 Executed on April 10, 2025, at Irvine, California.
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5 Laila Shams

6 Laila Shams
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