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6 Attorneys for Plaintiff,
7 Taiwo Oyeleye, on behalf of himself and all others similarly situated, and on behalf of the general
public,

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11 TAIWO OYELEYE, on behalf of himself, and
12 all others similarly situated, and on behalf of
the general public,

13 Plaintiff,

14 vs.

15 INCLUSION SERVICES, LLC, a
16 California Limited Liability Company, and
DOES 1 through 10, inclusive,

17
18 Defendants.

CASE NO.: 25STCV18888

[PROPOSED] ORDER AND JUDGMENT

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1. The “PAGA Members” shall be defined as all persons who are or were employed by Inclusion Services as hourly paid non-exempt employees in the State of California at any time during the PAGA Period (April 21, 2024 through the date the Court approves the Settlement).
2. The Court hereby approves the Settlement as fair, reasonable, and adequate, and directs the Parties to effectuate the Settlement according to its terms.
3. Defendant shall fund the Gross Settlement Amount of \$235,000.00 with the Administrator within 21 calendar days after the Effective Date.
4. The Court hereby approves, as to the form and content, the Notice to PAGA Members attached as Exhibit 8 to the Declaration of Roman Otkupman.
5. The Court hereby appoints Simpluris, Inc. (“Simpluris”) as the Administrator.
6. The Administrator is directed to mail the Individual PAGA Payments and the Notice to PAGA Members within 7 days after Defendant fully funds the Gross Settlement Amount, pursuant to the terms of the Settlement.
7. The Court finds that attorneys’ fees in the amount of 33 and 1/3% of the Gross Settlement Amount (\$78,333.33) for PAGA Counsel, and reimbursement of litigation costs in the amount of actual costs incurred, which to date are \$14,255.95, are fair, reasonable, and adequate, and orders the Administrator to distribute these payments to PAGA Counsel as provided for in the

1 Settlement.

2 8. The Court orders that Simpluris shall be paid \$4,819.00 for all of its work done and
3 to be done until the completion of this matter, pursuant to Simpluris' bid, which is attached as
4 Exhibit 7 to the Declaration of Roman Otkupman.

5 9. The Court finds that the amount of \$89,434.62, representing 65% of the \$137,591.72
6 allocated as PAGA civil penalties under the Settlement, to be paid to the California Labor and
7 Workforce Development Agency ("LWDA") as provided for by the Settlement, is fair, adequate,
8 and reasonable, and orders that payment be made to the LWDA in accordance with the terms of the
9 Settlement. The remaining amount of \$48,157.10, representing 35% of the PAGA civil penalties
10 under the Settlement shall be distributed amongst the PAGA Members pursuant to the Settlement.

11 10. The Court approves the scope of the release as set forth in the Settlement.

12 11. Upon entry of this Order, the Court hereby enters judgment pursuant to the terms of
13 the Settlement and all terms of the Settlement are hereby incorporated into this Order and Judgment.
14 All definitions in the Settlement shall apply to those same terms used anywhere in this Order and
15 Judgment.

16 12. The Court sets a Final Accounting hearing _____ at _____
17 in Department 15.

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20 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

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23 Dated: _____

HON. TIMOTHY PATRICK DILLON
JUDGE OF THE SUPERIOR COURT