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

11 ANDRE TAYOR, an individual,
12 Plaintiff,

13 v.
14

15 BARRETT FINANCIAL GROUP, LLC, an
16 Arizona limited liability company; and DOES
17 1-25, inclusive,
18 Defendants.
19

Case No. 22STCV32618

Reservation ID: 387267273348

Assigned for all purposes to Hon. Daniel M.
Crowley, Dept. 71

**[PROPOSED] ORDER APPROVING
SETTLEMENT OF LABOR CODE §2698,
et seq. PRIVATE ATTORNEYS GENERAL
ACT (“PAGA”) CLAIMS**

Date: June 5, 2025
Time: 8:30 a.m.
Dept.: 71

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21 On June 5, 2025, at 8:30 a.m., or as soon thereafter as the matter could be heard, in
22 Department 71 of this Court, before the Honorable Daniel M. Crowley, this motion came on
23 regularly for hearing. All parties were represented by counsel. After briefing and argument, the
24 Court rules as follows:

25 On January 30, 2025, Plaintiff filed an unopposed Motion for Approval of Settlement of
26 Labor Code Section 2698, *et. seq.*, Private Attorneys General Act (“PAGA”) Claims and
27 supporting documentation. The Court received and considered Plaintiff’s Motion, the declaration
28 and exhibits in support thereof, the Settlement Agreement, and other evidence and the arguments

of counsel, and good cause appearing, the Motion for Approval of Settlement of Labor Code Section 2698, *et. seq.*, Private Attorneys General Act (“PAGA”) Claims is hereby **GRANTED**.

THE COURT FURTHER ORDERS AS FOLLOWS:

1. California Labor Code section 2699(s)(2) requires that the “superior court shall review and approve any settlement of any civil action filed pursuant to” the PAGA. Because the Court finds the parties' settlement to have been agreed upon only after extensive and costly investigation, arms-length negotiations in mediation, and in an attempt to avoid further delays and costs, the Court grants approval of the terms and procedures set forth in the Settlement Agreement attached as Exhibit B to the Declaration of John A. Lofton in Support of Plaintiff’s Motion for Approval of Settlement of Labor Code Section 2698, *et. seq.*, Private Attorney’s General Act Claims. The Settlement Agreement is incorporated by reference in its entirety, as if stated here in full.

2. The Court finds that the Settlement is fair, reasonable, and adequate in all respects. The Court finds the Settlement was reached following diligent discovery and investigation conducted by counsel for all parties, and the Settlement is a result of adversarial, arm’s-length negotiation between the parties.

3. The Court, therefore, approves this Settlement as set forth in the Settlement Agreement.

4. Section 2699(k)(1) of the PAGA provides that an employee who prevails in any action under the PAGA shall be entitled to an award of reasonable attorney’s fees and costs. Pursuant to section 2699(k)(1), and the equitable common fund fee-spreading doctrine as discussed in Lafitte v. Robert Half Int’l, 1 Cal.5th 480, 486, 503 (2016), the Court approves the request by Plaintiffs’ Counsel for attorney’s fees in an amount of one-third of the Gross Settlement Amount, which is \$201,667.00.

5. Pursuant to Section 2699(k)(1), the Court also finds the litigation costs sought by Plaintiff in the amount of \$17,742.43 are reasonable expenditures that are awarded.

6. The Court approves Plaintiff’s request for an Incentive Award in the amount of \$10,000.00. The declaration of Plaintiff’s Counsel supports that Plaintiff provided valuable

1 assistance in the prosecution of the case. The Court finds the incentive payment to be fair and
2 reasonable compensation based on the evidence presented.

3 7. The Court appoints Atticus Administration, LLC, as Settlement Administrator.
4 Based on the evidence submitted, the Court finds that Atticus Administration, LLC is experienced
5 in claims administration and competent to perform the tasks required. The Court approves the
6 administration costs of up to \$5,000. Any unused amounts will revert to the Net Settlement
7 Amount.

8 8. The Court approves the deadlines set forth in the Settlement Agreement for
9 administration of the Settlement.

10 9. As of the Effective Date, the Plaintiff and all PAGA Employees are bound by the
11 release of Private Attorneys General Act claims contained in the Settlement Agreement.

12 10. The Settlement Agreement and this Order are binding on, and have res judicata and
13 preclusive effect in, all pending and future lawsuits or other proceedings: (i) that are maintained by
14 or on behalf of Plaintiff, any PAGA Employee, or their respective representatives, agents,
15 attorneys, heirs, administrators, successors, assigns, and/or anyone claiming through them or
16 acting or purporting to act for them or on their behalf, and (ii) encompass the claims released in
17 the Settlement Agreement, regardless of whether the Plaintiff or PAGA Employee previously
18 initiated or subsequently initiates individual litigation or other proceedings encompassed by the
19 Settlement Agreement, and even if such PAGA Employee never received/receives notice of this
20 Action or this proposed Settlement.

21 11. Upon entry of this Order, the Parties shall effectuate all terms of the Settlement
22 based on the provisions and timelines set forth in the Settlement Agreement.

23 12. Without affecting the finality of this Order in any respect, pursuant to Code of Civil
24 Procedure 664.6, the Court retains jurisdiction over this action, and the parties thereto, for the
25 purposes of: (a) the implementation and enforcement of the Settlement Agreement until each and
26 every act agreed to be performed by the parties to the Settlement Agreement shall have been
27 performed; (b) any other action necessary to conclude and implement the Settlement Agreement;
28 and (c) the construction and interpretation of the Settlement Agreement.

1 13. Any residual funds remaining after the expiration date of the check cashing period
2 shall be distributed to the DIR Unclaimed Property Fund.

3 14. The Court sets a compliance hearing for _____, 2025 at
4 _____ in Dept. 71.

5 15. Plaintiff is directed to submit a copy of this Order to the Labor and Workforce
6 Development Agency within ten days of entry.

7
8 **IT IS SO ORDERED.**

9
10 Date: _____, 2025

Honorable Daniel M. Crowley
Superior Court Judge