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10 Attorney for Plaintiff Kaitlin Talley, on
11 behalf of herself and all others similarly
situated and the general public

12
13 SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF SANTA CLARA

15 KAITLIN TALLEY, on behalf of herself and	) Case No. 22CV403416
16 all others similarly situated and the general	) Honorable Charles F. Adams
public,	) Dept. 7
17	)
Plaintiff,	) [PROPOSED] ORDER GRANTING
18	) APPLICATION FOR APPROVAL OF
v.	) PAGA SETTLEMENT
19	)
20 TRAVEL NURSE ACROSS AMERICA, LLC	) Date: May 8, 2025
an Arkansas limited liability company; and	) Time: 1:30 p.m.
21 DOES 1 to 100,	) Dept.: 7
	)
22 Defendants.	) Action filed: September 22, 2022
	)

1 This matter came on for hearing before the Honorable Charles F. Adams, Dept. 7, on May
2 8, 2025, at 1:30 p.m., in the Santa Clara County Superior Court located at 191 N. First Street, San
3 Jose, CA 95113, on Plaintiff Kaitlin Talley's ("Plaintiff") Motion for Approval of PAGA
4 Settlement, and for Attorneys' Fees and Costs, representative enhancement, and Administrative
5 Fees ("PAGA Approval Motion"). The Court, having considered the papers filed in support of the
6 motion; arguments of counsel; and all files, records, and other matters properly before the Court,
7 hereby determines as follows:

8 (A) The settlement was entered into in good faith, and the terms of the settlement are
9 fair, reasonable and adequate and comply with the requirements of Labor Code section 2699, after
10 considering the maximum potential recovery, the merits of Plaintiff's claims, and the means by
11 which the parties arrived at the settlement;

12 (B) The fees requested by Plaintiff's counsel are reasonable given: (a) the hours worked
13 by Plaintiff's counsel; (b) the results achieved; (c) the risks of litigation; (d) the skill required and
14 the quality of work; and (e) the contingent nature of the fee.

15 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED, ADJUDGED AND**
16 **DECREED AS FOLLOWS:**

17 (1) Plaintiff's PAGA Approval Motion is **GRANTED**.

18 (2) The Court approves the allocation and settlement of penalties under the Private
19 Attorney General Act ("PAGA") in this matter in the total amount of Eight Hundred and Fifty
20 Thousand Dollars and Zero Cents (\$850,000.00) (the "Gross Settlement Amount"). In accordance
21 with the Settlement Agreement, Plaintiff's counsel is awarded attorney's fees in the amount of
22 \$297,500.00 and litigation costs in the amount of \$15,000.00. Additionally, Plaintiff's
23 Representative Service Payment of \$1,500.00 is granted, as is an Administrator Expenses Payment
24 in the amount of \$7,987.00. PAGA Penalties in the amount of \$528,013.00 shall be paid from the
25 Gross Settlement Amount, with \$396,009.75 payable to the Labor and Workforce Development
26 Agency (75%), and \$132,003.25 payable to the Aggrieved Employees (25%).

27 (3) As of the date of this order, all Aggrieved Employees, the state of California, and
28 the LWDA are deemed to release, on behalf of themselves and their respective former and present

1 representatives, agents, attorneys, heirs, administrators, successors and assigns, the Released
2 Parties from all claims for PAGA claims that were alleged, or reasonably could have been alleged,
3 based on the facts stated in the Complaint and the PAGA Notice, and alleged in the Action,
4 including but not limited to claims for all alleged Labor Code and Wage Order violations specified
5 therein. The settlement shall be effective to adjudicate and release the claims and/or rights of the
6 LWDA to recover civil penalties against TNAA for the released Labor Code and/or Wage Order
7 violations suffered by any of the Aggrieved Employees (i.e., entry of Judgment shall have res
8 judicata effect as to those claims of the LWDA, whether pursued directly by the LWDA or by a
9 representative pursuant to PAGA)..

10 (4) Plaintiff shall provide Notice of this Order to the LWDA within 14 calendar days
11 after its entry.

12 (5) Judgment is entered into pursuant to this order, with the Court retaining jurisdiction
13 to enforce its terms pursuant to Code of Civil Procedure section 664.6.

14 (6) Nothing in this Order or the Settlement shall be construed as an admission or
15 concession by any party. The Settlement and this resulting Order and entry of judgment simply
16 represent a compromise of disputed allegations.

17
18
19 Date: _____

Honorable Charles F. Adams
Judge of the Superior Court