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April 10, 2025

FILED  
Clerk of the Superior Court

MAY 09 2025

By: R. Day, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

KRISTI LYNN WHITE, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

EL CAJON POST ACUTE, LLC; and  
DOES 1 through 20, inclusive,

Defendants.

Case No. 37-2022-00036585- CU-OE-CTL

*Assigned for All Purposes to:*  
*Judge Joel R. Wohlfeil*  
*Dept. C-73*

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

Date: May 9, 2025  
Time: 9:00 a.m.  
Dept. C-73

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

1 The Court has received and considered the joint stipulation of Plaintiff Kristi Lynn  
2 White, as an individual, and on behalf of the people of the State of California and as an  
3 “aggrieved employee” acting as a private attorney general under the Labor Code Private  
4 Attorneys General Act of 2004, § 2699, *et seq.* (“PAGA”) and Defendant El Cajon Post Acute,  
5 LLC (“Defendant”) in the above-captioned action.

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

7 This 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 Kristy R. Connolly In Support of Motion for Approval of Private Attorneys General Act  
10 Representative Action Settlement, filed on April 10, 2025, and all terms defined therein shall  
11 have the same meaning as set forth in the Settlement.

12 The Court hereby approves the Parties’ proposed Settlement and hereby enters FINAL  
13 JUDGMENT based on the terms set forth in the Parties’ Settlement in favor of Plaintiff and the  
14 Aggrieved Employees. Of this, one-third of the Gross Settlement Amount is awarded as  
15 attorney fees paid to Plaintiff’s Counsel, \$29,939.65 is awarded as costs paid to Plaintiff’s  
16 Counsel, \$15,000.00 is awarded to Plaintiff in exchange for a General Release, and \$4,750 is  
17 awarded as administrative costs paid to the Settlement Administrator, Phoenix Settlement  
18 Administrator. Of the remaining Net Settlement Amount, 75% shall be paid to the Labor and  
19 Workforce Development Agency and 25% shall be paid to the Aggrieved Employees as set  
20 forth in the Settlement Agreement.

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

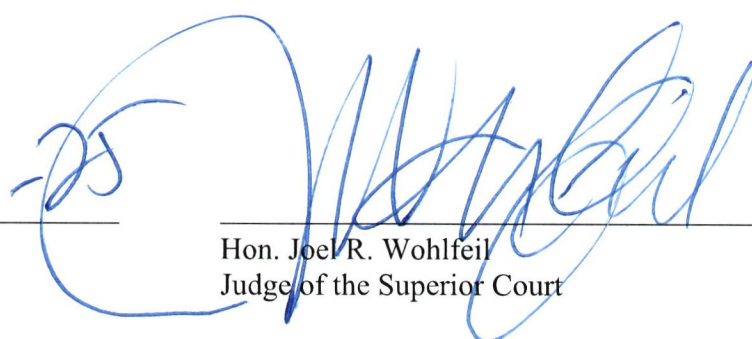
26 This Judgment is intended to be a final disposition in its entirety of the above captioned  
27 action. Without affecting the finality of this judgment in any way, the Court retains jurisdiction  
28

1 of all matters relating to the interpretation, administration, implementation, effectuation, and  
2 enforcement of the Settlement pursuant to C.C.P. § 664.6.

3 IT IS SO ORDERED.

4  
5  
6 Dated: \_\_\_\_\_

5-9-25



Hon. Joel R. Wohlfeil  
Judge of the Superior Court