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Attorneys for Plaintiff Joseph de Paz

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JOSEPH DE PAZ, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

RIMOWA DISTRIBUTION, INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 22STCV34510

PAGA REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Stuart M.
Rice, Dept. 1]*

**NOTICE OF RULING GRANTING
PLAINTIFF'S MOTION TO APPROVE
THE PAGA SETTLEMENT**

Hearing Date: May 29, 2025
Time: 10:30 a.m.
Dept.: 1

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that the Court has granted Plaintiffs' Motion to Approve the
3 PAGA Settlement in the above-entitled action. A true and correct copy of the Court's 06/09/2025
4 Order and Judgment Granting Plaintiff's Motion to Approve the PAGA Settlement is attached hereto
5 as **Exhibit 1**.

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7 Respectfully submitted,

8 Dated: June 11, 2025

WILSHIRE LAW FIRM, PLC

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10 By: 

Alan Wilcox

11 *Attorneys for Plaintiff*
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EXHIBIT 1

WILSHIRE LAW FIRM, PLC
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Attorneys for Plaintiff Joseph de Paz

FILED
 Superior Court of California
 County of Los Angeles
 06/09/2025
 David W. Stryker, Executive Officer/Clerk of Court
 By: A. He Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JOSEPH DE PAZ, individually, and on behalf
 of all others similarly situated,

Plaintiff,

v.

RIMOWA DISTRIBUTION, INC., a
 corporation; and DOES 1 through 10,
 inclusive,

Defendants.

Case No.: 22STCV34510

Assigned to: Hon. Stuart M. Rice, Dept. 1

Complaint filed: October 27, 2022

Trial date: Not set.

PAGA REPRESENTATIVE ACTION

**[PROPOSED] ORDER AND JUDGMENT
 GRANTING PLAINTIFF’S MOTION TO
 APPROVE THE PAGA SETTLEMENT**

Hearing Date: May 29, 2025

Hearing Time: 10:30 a.m.

Dept.: 1

This matter came on for hearing on May 29, 2025, at 10:30 a.m. in Department 1 of the above-entitled Court, with the Honorable Stuart M. Rice presiding. Based on the pleadings on record, all papers submitted in connection with Plaintiff’s Notice of Motion and Motion to Approve PAGA Settlement (the “Motion”), and for good cause appearing, Plaintiff’s Motion is GRANTED.

The Court approves the PAGA Settlement Agreement entered into by Plaintiff Joseph de Paz (“Plaintiff”) and Defendant Rimowa Distribution, Inc., (“Defendant,” and, together with Plaintiff, the “Parties”) and attached as Exhibit 1 to the Declaration of Benjamin H. Haber filed concurrently with and in support of Plaintiff’s Motion, as modified by the subsequent stipulation of the Parties (the

1 “Settlement”), and hereby ORDERS as follows:

2 1. Defendant shall pay the Gross Settlement Amount of \$80,000.00 according to the
3 terms of the Settlement.

4 2. The Net Settlement Amount means the Gross Settlement Amount minus the
5 following: (a) \$26,666.67 allocated to Attorneys’ Fees; (b) \$17,039.27 allocated to litigation costs;
6 (c) \$3,500.00 allocated to Settlement Administrator Costs; and (d) \$5,000.00 allocated to Plaintiff
7 as a Service Award. The Net Settlement Amount is \$27,794.06.

8 (a) The Court approves payment to Plaintiff’s counsel, Wilshire Law Firm, PLC
9 of Attorneys’ Fees in the amount of Twenty-Six Thousand Six Hundred Sixty-
10 Six Dollars and Sixty-Seven Cents (\$26,666.67), to be paid from the Gross
11 Settlement Amount.

12 (b) The Court approves payment to Plaintiff’s counsel, Wilshire Law Firm, PLC
13 of litigation costs in the amount of Seventeen Thousand Thirty-Nine Dollars
14 and Twenty-Seven Cents (\$17,039.27), to be paid from the Gross Settlement
15 Amount.

16 (c) The Court approves payment to the Settlement Administrator, Phoenix
17 Settlement Administrators, for its reasonable costs and fees to administer the
18 Settlement, in the amount of Three Thousand Five Hundred Dollars and Zero
19 Cents (\$3,500.00), to be paid from the Gross Settlement Amount.

20 (d) The Court approves Five Thousand Dollars and Zero Cents (\$5,000.00) to be
21 paid to Plaintiff as a Service Payment for his efforts as a named plaintiff and
22 representative for other PAGA Employees and the State of California, to be
23 paid from the Gross Settlement Amount.

24 3. Of the Net Settlement Amount, 75%, \$20,845.55, is allocated to the California Labor
25 and Workforce Development Agency (“LWDA”); and 25%, \$6,948.51, is allocated to the Individual
26 PAGA Payments.

27 4. The “PAGA Period” is defined as the period from October 31, 2021, through June
28 20, 2024.

1 5. “Aggrieved Employee” means all non-exempt employees who worked for Defendant
2 in the State of California during the PAGA Period.

3 6. “Effective Date” means the date by which both of the following have occurred: (a)
4 the Court enters Judgment on the Settlement Approval Order and (b) the Judgment is final. The
5 Judgment is final as of the latest of the following occurrences: (i) if there is an appeal of the Court’s
6 Judgment, the date the order and judgment approving the settlement are affirmed on appeal, the date
7 of dismissal of such appeal, or the expiration of the time to file a petition for writ of certiorari; (ii)
8 if a petition for writ of certiorari is filed, the date of denial of the petition for writ of certiorari, or
9 the date the order and judgment approving the settlement are affirmed pursuant to such petition; or
10 (iii) if no appeal is filed, the expiration date of the time for filing or noticing any appeal of the order
11 approving the settlement and/or entry of judgment.

12 7. The Court directs Defendant to fully fund the Gross Settlement Amount by
13 transmitting the funds to the Settlement Administrator within 15 days of the Effective Date.

14 8. The amount of each Aggrieved Employee’s Individual PAGA Payment will be
15 calculated as follows: (a) the Settlement Administrator will divide the amount of the Aggrieved
16 Employees’ share of PAGA Penalties by the total number of PAGA Period Pay Periods worked by
17 all Aggrieved Employees during the PAGA Period; and (b) the Settlement Administrator will
18 multiply the result by each Aggrieved Employee’s PAGA Pay Periods.

19 9. The Court directs the Parties and the Settlement Administrator to carry out the terms
20 of the Settlement.

21 10. Under California Code of Civil Procedure section 664.6, the Court retains jurisdiction
22 over the Parties to enforce the Settlement until performance in full of the Settlement’s terms.

23 11. Plaintiff’s counsel shall submit a copy of this Order to the LWDA within seven (7)
24 days of the entry of this Order.

25 12. The above-referenced action and all claims asserted by Plaintiff individually and in a
26 representative capacity are hereby dismissed with prejudice.

27 13. A hearing is set for June 9, ²⁰²⁶~~2025~~ at 8:30 a.m. in Department 1 of the above-entitled
28 Court to confirm that the Parties and Settlement Administrator have complied with the Settlement

1 and this Order. Plaintiff shall file a declaration from the Settlement Administrator regarding
2 compliance with the Settlement terms prior to that hearing.

3 14. Plaintiff shall give notice of this Order.



A handwritten signature in black ink, appearing to read "Stuart M. Rice".

4 DATE: 06/09/2025

Stuart M. Rice / Judge

5 Hon. Stuart M. Rice
6 Los Angeles County Superior Court Judge

Joseph de Paz v. Rimowa Distribution, Inc.
Case No.: 22STCV34510

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NOTICE OF RULING GRANTING PLAINTIFF'S MOTION TO APPROVE THE PAGA
SETTLEMENT