

Tyler D. Kring, Bar No. 325588
tkring@kringandassociates.com
Jeffrey T. Green, Bar No. 330065
jgreen@kringandassociates.com
KRING & ASSOCIATES, APC
38 Corporate Park
Irvine, CA 92606-5105
Telephone: (949) 393-1400
Facsimile: (949) 393-1430
E-Service: eserve@kringandassociates.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
8/27/2025 5:08 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Abraham, Deputy Clerk

Attorneys for Plaintiff
PAUL VARGAS, as Private Attorney General

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

STATE OF CALIFORNIA ex rel. PAUL
VARGAS, as Private Attorney General,

Plaintiff,

vs.

ECONO-WEST, INC.; and DOES 1-25,
inclusive,

Defendants.

) Case No. 22STCV40464

) Date: August 21, 2025

) Time: 8:30 AM

) Dept: 78

) **AMENDED NOTICE OF RULING**
) **REGARDING PLAINTIFF'S MOTION**
) **FOR APPROVAL OF PAGA**
) **SETTLEMENT**

) Assigned for All Purposes To:

) Judge: Hon. Tiana J. Murillo

) Dept: 78

) Action Filed: December 27, 2022

) Trial Date: June 3, 2024

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE Plaintiff's Motion for Approval of PAGA Settlement ("Motion")
came before this Court. Tyler D. Kring, Esq., counsel for Plaintiff, and Laura Burnbaum, counsel
for Defendant, appeared via LACC. The Honorable Tiana J. Murillo issued a tentative ruling
which, following a slight revision to remove the Court's inadvertent references to Labor Code
sections 1194 and 1194.2 in the release discussion, became the final ruling. The Court issued a
Minute Order on August 21, 2025 regarding the Motion, a copy of which is attached hereto as

///

///



1 Exh. A. In addition, the Court issued an additional Minute Order on August 25, 2025, a copy of
2 which attached here to as Exh. B.

3 Dated: August 27, 2025

KRING & ASSOCIATES, APC

4 By:

5 
6 Tyler D. Kring and Jeffrey T. Green
7 Attorneys for Plaintiff, PAUL VARGAS,
8 as Private Attorney General
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



EXHIBIT A

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

August 21, 2025

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): Tyler Dion Kring via LACC

For Defendant(s): Matthew Richardson by Laura Birnbaun via LACC

NATURE OF PROCEEDINGS: Hearing on Motion - Other Motion for Approval of PAGA Settlement; Order to Show Cause Re: Dismissal (Settlement)

The Court's tentative ruling is posted online for the parties to review.

The matter is called for hearing.

The Court and counsel confer regarding the tentative ruling.

The Court has read and considered all documents filed hereto regarding the above-captioned Motion. Counsel is given the opportunity to argue. After oral argument, the Court adopts its Tentative Ruling as the Final Ruling as follows:

I. BACKGROUND

On December 27, 2022, Plaintiff State of California ex rel. Paul Vargas, Private Attorney General ("Plaintiff") filed a Complaint for Civil Penalties Under the Private Attorneys General Act ("PAGA") of 2004 against Defendant Econo-West, Inc. ("EWI" or "Defendant") and DOES 1 through 25, alleging causes of action for: (1) Misclassification of Employees; (2) Failure to Pay for All Hours Worked; (3) Failure to Provide Compliant Meal and Rest Periods; (4) Inaccurate Wage Statements; (5) Untimely Payment of Wages; (6) Failure to Pay Wages at Termination; (7) Failure to Keep Accurate Records of Hours Worked; (8) Failure to Reimburse Expenses; and (9) Retaliation.

On March 8, 2023, EWI filed an Answer to the Complaint.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

August 21, 2025

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

On May 16, 2025, Plaintiff filed the instant Motion for Approval of PAGA Settlement. The motion is unopposed.

Plaintiff's counsel states that "On November 7, 2023, the Parties participated in an all-day mediation presided over by mediator Henry Bongiovi Esq. and ultimately reached a settlement to fully resolve Plaintiff's PAGA claims asserted in this case." (Declaration of Tyler D. Kring ("Kring Decl."), ¶4.)

II. LEGAL STANDARD

A superior court must "review and approve any settlement of any civil action filed pursuant to this part." (Lab. Code, § 2699, subd. (s)(2).)

While there is no statutory or common law standard for approval of a PAGA settlement, the standard used for approval of class action settlements is instructive. "[A] presumption of fairness exists where: (1) the settlement is reached through arm's-length bargaining; (2) investigation and discovery are sufficient to allow counsel and the court to act intelligently; (3) counsel is experienced in similar litigation; and (4) the percentage of objectors is small." (*Dunk v. Ford Motor Co.* (1996) 48 Cal.App.4th 1794, 1802.) The last factor, small percentage of objectors, is inapplicable to PAGA claims. (*See Arias v. Superior Court* (2009) 46 Cal.4th 969, 984-985 [rejecting the argument that representative actions under PAGA violate the due process rights of "nonparty aggrieved employees who are not given notice of, and an opportunity to be heard"].) Additional factors that are useful to consider include the strength of a plaintiff's case, the risk, expense, complexity and likely duration of further litigation, the amount offered in settlement, the extent of discovery completed, and the experience and views of counsel. (*See Kullar v. Foot Locker Retail, Inc.* (2008) 168 Cal.App.4th 116, 128.)

III. DISCUSSION

Plaintiff's counsel indicates that the parties entered into a Stipulation of PAGA Settlement (herein the "Settlement Agreement"). (Kring Decl., ¶4, Ex. 1.)

The Court finds that the settlement appears to have been reached through arm's-length bargaining with sufficient discovery. The parties reached the settlement through a private all-day mediation session following informal exchange of information, which occurred after Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

August 21, 2025

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

filed the lawsuit. The informal discovery included reviewing policy documents, data regarding time sheets and pay roll records, memos, and other documents to generate a comprehensive damage report. (Kring Decl., ¶3.)

The Court further finds that Plaintiff was represented by competent counsel with four years of experience in wage and hour class action and PAGA litigation in the Los Angeles area. (Kring Decl., ¶13; Declaration of Jeffrey T. Green (“Green Decl.”), ¶¶3-4.) Although there is no evidence presented attesting to the competence and experience of defense counsel, Musick, Peeler & Garrett LLP, there also no evidence of the contrary. As such, the proposed Settlement Agreement is entitled to a presumption of fairness.

A. Compliance with Labor Code Requirements

“[C]ivil penalties recovered by aggrieved employees shall be distributed as follows: 65 percent to the Labor and Workforce Development Agency for enforcement of labor laws, including the administration of this part, and for education of employers and employees about their rights and responsibilities under this code, to be continuously appropriated to supplement and not supplant the funding to the agency for those purposes; and 35 percent to the aggrieved employees.” (Lab. Code, § 2699, subd. (m).) This amendment to Labor Code Section 2699, however, “shall not apply to a civil action with respect to which the notice required by subparagraph (A) of paragraph (1) of subdivision (a), paragraph (1) of subdivision (b), or subparagraph (A) of paragraph (1) of subdivision (c) of Section 2699.3 was filed before June 19, 2024.” (Lab. Code, § 2699, subd. (v)(2).) Plaintiff’s PAGA notice was sent to the Labor and Workforce Development Agency on December 27, 2022. (Kring Decl., ¶2.) Therefore, the 75% to the Labor and Workforce Development Agency and 25% to the aggrieved employee distribution for civil penalties applies in this instant case and not the amended 65/35 split.

The proposed Settlement Agreement is for \$67,500.00, inclusive of payments to the LWDA and PAGA Employees, attorneys’ fees and costs, and settlement administration costs. (Kring Decl., ¶7.) Plaintiff’s counsel will be paid \$23,625.00 for fees and \$12,450.45 for litigation costs. (*Id.*) The settlement administrator Phoenix Class Action Administration Solutions will be paid \$2,750.00. (*Id.*) After deducting these amounts, a net settlement amount of \$20,674.55 will be disbursed to the LWDA and to the PAGA Aggrieved Employees on a pro-rata basis based on their respective Eligible Pay Periods during the Covered Period. (*Id.*) Specifically, 75% or \$15,505.91 will be paid to the LWDA, and 25% or \$5,168.64 will be paid to the PAGA Aggrieved Employees. (*Id.*) Plaintiff’s representative enhancement award is for

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

August 21, 2025

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

\$8,000.00. (*Id.* at ¶18.)

Thus, the Court finds that the proposed Settlement Agreement terms conform with the requirements set forth Labor Code Section 2699, subdivision (m).

Additional factors that are useful to consider in determining whether to approve the settlement include the strength of a plaintiff's case, the risk, expense, complexity and likely duration of further litigation, the amount offered in settlement, the extent of discovery completed, and the experience and views of counsel. (*Kullar v. Foot Locker Retail, Inc.* (2008) 168 Cal.App.4th 116, 128.)

Although Plaintiff contends that there is sufficient evidence to support the allegations that Defendant violated the Labor Code and owes statutory penalties, Plaintiff also acknowledges that Defendant maintained several defenses to the PAGA claim, which if successful had the potential to eliminate or substantially reduce recovery. (Kring Decl., ¶¶8-10.) Thus, Plaintiff has demonstrated that the proposed Settlement Agreement merits approval.

B. Release of Claims

If the Court approves the PAGA settlement, the Aggrieved Employees will release the Released Parties

from all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA Period facts stated in the Operative Complaint and/or the PAGA Notice, including, but not limited to, misclassification of employees, failure to pay for all hours worked, including off the clock work, minimum wages and overtime, failure to provide compliant meal and rest periods, inaccurate wage statements, untimely payment of wages, failure to pay wages at termination, failure to keep accurate records of hours worked, failure to reimburse expenses, retaliation, Labor Code sections 96, 98, 98.6, 201, 201.3, 201.5, 201.9, 202, 203, 204, 204b, 204.1, 204.2, 205.5, 226, 226.7, 226.8, 512, 558, 1101, 1174, 1174.5, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198, 1682, 2698, 2699 et seq., 2699.3, 2775, 2802. and the applicable Industrial Welfare Commission Orders.

(Kring Decl. Ex. 1; Settlement Agreement at ¶ 5.)

This release appears to go beyond what was pled in the Complaint or otherwise not be

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.

August 21, 2025

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

subject to PAGA (i.e., statutes where a civil penalty can be assessed for violation), specifically, the references to Labor Code sections 96, 98, 204.1, 204.2, 1101, and 1682. Further, the Court cannot assess whether the released claims are beyond those that Plaintiff originally represented to the LWDA, because Plaintiff has not included a copy of the letter in his moving papers.

C. Attorney's Fees, Costs, and Settlement Administration

A prevailing employee is entitled to an award of reasonable attorney fees and costs incurred in the action. (Lab. Code, § 2699, subd. (g)(1).) California Rules of Court, rule 3.769, subdivision (b) requires that "[a]ny agreement... with respect to the payment of attorney's fees or the submission of an application for the approval of attorney's fees must be set forth in full in any application for approval of the dismissal or settlement of an action that has been certified as a class action." Despite any agreement by the parties to the contrary, "the court ha[s] an independent right and responsibility to review the attorney fee provision of the settlement agreement and award only so much as it determined reasonable." (*Garabedian v. Los Angeles Cellular Telephone Co.* (2004) 118 Cal.App.4th 123, 128.)

"Courts recognize two methods for calculating attorney fees in civil class actions: the lodestar/multiplier method and the percentage of recovery method." (*Wershba v. Apple Computer, Inc.* (2001) 91 Cal.App.4th 224, 254.) Here, Plaintiff's counsel requests attorney fees using the percentage method.

The Settlement Agreement provides for fees to counsel "of not more than 40% which is currently estimated to be \$27,000.00," and costs "of not more than \$17,000." (Kring Decl., Ex.1, Settlement Agreement at ¶ 3.2.2.) Plaintiff's counsel seeks \$23,635.00 total in attorney's fees, representing 35% of the Gross Settlement Amount (\$67,500.00). (Kring Decl., ¶ 7.) Counsel attests to expending approximately 64.80 hours litigating this case (which includes ten hours not yet expended) at an hourly rate of \$550.00 per hour each. (Kring Decl., ¶14, Ex. 2; Green Decl., ¶6.) The percentage method therefore appears to be less than counsel's lodestar calculations. In reviewing the evidence, the Court finds the attorney's fees reasonable.

Likewise, Plaintiff's counsel attests to incurring \$12,450.45 in litigation costs and expenses. (Kring Decl., ¶15, Ex. 3.) The costs are supported by the attestations and lower than what is provided for in the Settlement Agreement. The costs appear generally reasonable, other than entries for mediation lunch and two processing fees (for a total of \$634.94.) Therefore, the Court finds that costs in the reduced amount of \$11,815.51 are reasonable.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

August 21, 2025

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

Finally, the Settlement Agreement provides for an “Administrator Expenses Payment not to exceed \$10,000.00 except for a showing of good cause and as approved by the Court.” (Kring Decl., Ex.1, Settlement Agreement at ¶ 3.2.3.) Plaintiff asks the Court to approve \$2,750.00 in administration costs. (Motion, pp. 8-9.) The Court likewise finds this reasonable.

D. “Representative Service Award” to Plaintiff

Incentive awards are used as a common practice in PAGA actions, a practice derived from class action procedures. However, such incentive awards are neither mentioned nor expressly prohibited by the PAGA statute.

In class actions, a service (or incentive) fee award to a named class representative must be supported by evidence that quantifies the time and effort expended by the individual and a reasoned explanation of financial or other risks undertaken by the class representative. See *Clark v. American Residential Services LLC* (2009) 175 Cal.App.4th 785, 806-807; see also *Cellphone Termination Cases* (2010) 186 Cal.App.4th 1380, 1394-1395 [“Criteria courts may consider in determining whether to make an incentive award include: (1) the risk to the class representative in commencing suit, both financial and otherwise; (2) the notoriety and personal difficulties encountered by the class representative; (3) the amount of time and effort spent by the class representative; (4) the duration of the litigation and; (5) the personal benefit (or lack thereof) enjoyed by the class representative as a result of the litigation. (Citations.)”].

If the amount of an incentive payment is unjustified, it can be reduced. (See *Uribe v. Crown Building Maintenance Co.* (2021) 70 Cal.App.5th 986, 995, 998 [noting trial court reduced request for \$10,000 enhancement award in a \$370,000 PAGA settlement to \$5,000].). Further, “an action to recover civil penalties is fundamentally a law enforcement action designed to protect the public and not to benefit private parties.” (*Iskanian v. CLS Transportation Los Angeles, LLC* (2014) 59 Cal.4th 348, 381.)

Plaintiff requests \$8,000.00 as an enhancement award for his efforts in this case. (Declaration of Paul Vargas (“Vargas Decl.”), ¶4.) Plaintiff attests to, *inter alia*, performing ongoing review of the case with counsel via in-person meetings and telephonically/virtually, compiling documents for assistance with prosecution of the case and evaluation of his claims, assisting in informal discovery and mediation, and participating in the approval process of the settlement of this case. (*Id.*) Mr. Vargas also attests that he took a risk in being a named representative, because it is a “public lawsuit having a potential negative impact on future

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

August 21, 2025

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

employment opportunities,” as well as the risk of “being liable for the opposing party’s attorneys’ fees and costs.” (*Id.*, ¶ 5.)

Here, Mr. Vargas did not release any additional claims beyond those also being released by the Aggrieved Employees. Further, Mr. Vargas’ declaration does not specify the amount of time he expended in being the representative Plaintiff, and his claims of the risk he incurred are similarly vague or speculative. In proportion to the net settlement amount, \$8,000 is therefore excessive and not adequately justified.

Based on the information before the Court, including Plaintiff’s declaration, and in acknowledgment of the benefits obtained on behalf of the class, the Court finds that a reduced service award in the amount of \$5,000 to be appropriate.

E. LWDA

“The proposed settlement shall be submitted to the [Labor and Workforce Development Agency] at the same time that it is submitted to the court.” (Lab. Code § 2699, subd. (1)(2).) While Plaintiff’s counsel declares that a copy of the proposed settlement and the present motion is being provided to the LWDA concurrently with the filing of the motion “as set forth in the accompanying proof of service” (Kring Decl., ¶6), the proofs of service attached to the motion and declarations do not support Plaintiff’s counsel’s representation.

Absent evidence supporting counsel’s representation that the proposed settlement and present motion were submitted to the LWDA in accordance with Labor Code Section 2699, subdivision (1)(2), the present motion cannot be granted.

IV. CONCLUSION

Based on the foregoing, the Court CONTINUES Plaintiff Paul Vargas’ Motion for Approval of PAGA Settlement. The Court requests (1) proof that the settlement was submitted to LWDA; and (2) a copy of the original letter to LWDA to the Court.

The hearing is continued to September 8, 2025 at 9:30 a.m. Plaintiff is ordered to file a brief supplemental declaration to demonstrate proof of service to LWDA, and attach a copy of the original letter to LWDA, by September 4, 2025 at noon.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

August 21, 2025

8:30 AM

Judge: Honorable Tiana J. Murillo

CSR: None

Judicial Assistant: Diana Castro-Martinez/ JAT

ERM: None

Karina Marquez

Courtroom Assistant: Angela Comick

Deputy Sheriff: None

Moving Party is ordered to give notice.

DATED: August 20, 2025

Hon. Tiana J. Murillo

Judge of the Superior Court

On the Court's own motion, the Hearing on Motion - Other Motion for Approval of PAGA Settlement scheduled for 08/21/2025, and Order to Show Cause Re: Dismissal (Settlement) scheduled for 08/21/2025 are continued to 09/08/2025 at 08:30 AM in Department 78 at Stanley Mosk Courthouse.

Moving Party is to give notice.

Certificate of Service is attached.

EXHIBIT B

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 78

22STCV40464

August 25, 2025

**STATE OF CALIFORNIA EX REL. PAUL VARGAS, AS
PRIVATE ATTORNEY GENERAL vs ECONO-WEST, INC.**

11:39 AM

Judge: Honorable Tiana J. Murillo
Judicial Assistant: Diana Castro-Martinez
Courtroom Assistant: None

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Nunc Pro Tunc Order

It appearing to the Court that through inadvertence and/or clerical error, the minute order of 08/21/2025 in the above-entitled action does not properly reflect the Court's order. At the direction of the Judicial Officer, said minute order is corrected nunc pro tunc as of 08/25/2025, as follows:

By striking:

On the Court's own motion, the Hearing on Motion - Other Motion for Approval of PAGA Settlement scheduled for 08/21/2025, and Order to Show Cause Re: Dismissal (Settlement) scheduled for 08/21/2025 are continued to 09/08/2025 at 08:30 AM in Department 78 at Stanley Mosk Courthouse.

By adding:

On the Court's own motion, the Hearing on Motion - Other Motion for Approval of PAGA Settlement scheduled for 08/21/2025, and Order to Show Cause Re: Dismissal (Settlement) scheduled for 08/21/2025 are continued to **09/08/2025 at 09:30 AM** in Department 78 at Stanley Mosk Courthouse.

Judicial assistant is directed to give notice.

Certificate of Service is attached.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I, the undersigned, am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is Kring & Associates, APC, 38 Corporate Park, Irvine, CA 92606-5105, E-Service: mbennett@kringandassociates.com.

On August 27, 2025, I served true copies of the foregoing document(s) described as **AMENDED NOTICE OF RULING REGARDING PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT** on the interested parties in this action, addressed as follows:

SEE ATTACHED SERVICE LIST

☒ BY E-MAIL: As California Code of Civil Procedure section 1010.6 and all other applicable law including California Rules of Court permits, I caused a true copy of the document to be sent to the persons at the corresponding electronic address as indicated on the attached mailing list on the above-mentioned date. My electronic notification address is mbennett@kringandassociates.com. I am readily familiar with this firm's Microsoft Outlook electronic mail system and did not receive any electronic message or other indication that the transmission was unsuccessful.

☒ LWDA WEB SUBMISSION: Submitted documents via <https://dir.govfa.net/432>.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 27, 2025, at Irvine, California.


MICHELLE BENNETT



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PAUL VARGAS V. ECONO-WEST, INC.

K&A CLIENT: Paul Vargas
CLIENT NO.: 9300.0815

SERVICE LIST

Counsel of Record	Phone/Fax/Email	Party(ies) Represented
Beth A. Kahn Laura Birnbaum MUSICK, PEELER & GARRETT, LLP 333 South Hope Street, Suite 2900 Los Angeles, CA 90071	Phone (714) 668-2400 b.kahn@musickpeeler.com L.Birnbaum@musickpeeler.com	Attorneys for ECONO-WEST, INC.

