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*Attorneys for Plaintiff,*  
**CASSANDRA HALL-LEPREVOST**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

CASSANDRA HALL-LEPREVOST, an  
individual, and on behalf of all aggrieved  
employees

Plaintiff,

vs.

CANNACO RESEARCH CORPORATION, a  
California corporation; ANN LAWRENCE  
ATHEY, an individual; VFARM1509, INC., a  
California corporation; and DOES 2 through  
50 inclusive

Defendants.

**Case No. 23STCV00756**

Hon. Robert B. Broadbelt, Dept. 53

**[Proposed] ORDER APPROVING  
PARTIES' PAGA SETTLEMENT  
AGREEMENT**

Complaint filed: January 13, 2023  
Trial Date: None Set

1. The Court has received and considered the application of Plaintiff Cassandra Hall-LeProvost ("Plaintiff"), as an aggrieved employee acting as private attorney general under the Private Attorneys General Act of 2004, Labor Code section § 2698 et seq. ("PAGA"), for approval of the Parties' PAGA SETTLEMENT AGREEMENT ("PAGA Settlement Agreement"). **GOOD CAUSE** having been shown, the Court hereby approves the Parties' PAGA Settlement Agreement.

2. This Order hereby adopts and incorporates by reference the terms and

1 conditions of the PAGA Settlement Agreement.

2 3. The Court finds that it has jurisdiction over the subject matter of the action  
3 and over all parties to the action, including all Aggrieved Employees.

4 4. The Court has considered all relevant factors for determining the fairness of  
5 the PAGA Settlement Agreement and has concluded that all those factors weigh in favor of  
6 approving the PAGA Settlement Agreement. In particular, the court finds that the  
7 settlement was reached following meaningful discovery and investigation conducted by  
8 Plaintiff; that the PAGA Settlement Agreement is the result of serious, informed,  
9 adversarial, and arm's-length negotiations between the parties; and that the penalties  
10 obtained are genuine and meaningful.

11 5. Accordingly, the Court hereby approves the settlement as set forth in the  
12 PAGA Settlement Agreement and expressly finds that the settlement is, in all respects, fair,  
13 reasonable, adequate and hereby directs implementation of all remaining terms, conditions,  
14 and provisions of the PAGA Settlement Agreement.

15 6. The PAGA Settlement Agreement is not an admission by Defendant, nor is  
16 this Order a finding of the validity of any allegations or of any wrongdoing by Defendant.  
17 Neither this Order, the PAGA Settlement Agreement, nor any document referred to herein,  
18 nor any action taken to carry out the PAGA Settlement Agreement, may be construed as, or  
19 may be used as, an admission of any fault, wrongdoing, omission, concession, or liability  
20 whatsoever by or against Defendant.

21 7. The parties have also entered into a confidential individual Settlement  
22 Agreement for Plaintiff's non-representative claims.

23 8. The Court shall retain exclusive and continuing jurisdiction over the above-  
24 captioned action and the Parties under Code of Civil Procedure section 664.6 for purposes  
25 of enforcing the terms of the individual and PAGA Settlement Agreements.  
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**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

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Hon. Robert B. Broadbelt  
Judge of the Superior Court

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within lawsuit; my business address is 15515 W. Sunset Boulevard, Unit 214, Pacific Palisades, CA 90272.

On **February 2, 2024**, I served the foregoing document described as **[Proposed] ORDER APPROVING PARTIES' PAGA SETTLEMENT AGREEMENT** on the interested parties in this action by placing **[X]** a true copy thereof on:

|                                                                        |                                 |
|------------------------------------------------------------------------|---------------------------------|
| Nestor Barrero, Esq.                                                   | Labor and Workforce Development |
| Regina A. Musolino, Esq.                                               | Agency                          |
| Erik B. Von Zeipel                                                     | (By Posting on the LWDA PAGA    |
| CONSTANGY BROOKS                                                       | Website)                        |
| 2029 Century Park East, Suite 1100                                     |                                 |
| Los Angeles, CA 90067                                                  |                                 |
| <a href="mailto:nbarrero@constangy.com">nbarrero@constangy.com</a>     |                                 |
| <a href="mailto:rmusolino@constangy.com">rmusolino@constangy.com</a>   |                                 |
| <a href="mailto:evonzeipel@constangy.com">evonzeipel@constangy.com</a> |                                 |
| <i>Attorneys for Defendants Cannaco</i>                                |                                 |
| <i>Research Corporation, Ann Lawrence</i>                              |                                 |
| <i>Athey, and VFARM1509, Inc.</i>                                      |                                 |

**[ X ]** (BY E-MAIL ONLY): I hereby certify that this document was served from Los Angeles County, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

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

Executed on **February 2, 2024**, at Los Angeles County, California.

Calvin A. Marshall, Esq.

Type or Print Name

  
Signature