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Attorneys for Plaintiff Celeste Ramirez

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CELESTE RAMIREZ, as an aggrieved
employee pursuant to the Private Attorneys
General Act ("PAGA"), on behalf of the State of
California and other non-party Aggrieved
Employees,

Plaintiff,

vs.

STINKIN CRAWFISH RESTAURANTS
LLC, a California limited liability company;
STINKIN HOLDINGS LLC, a California
limited liability company; and DOES 1 through
10, inclusive,

Defendants.

Case No. 23STCV01420

Assigned to the Hon. Lee W. Tsao

RESERVATION ID: 923427966847

**~~PROPOSED~~ ORDER APPROVING THE
PARTIES' PAGA SETTLEMENT
AGREEMENT AND JUDGMENT**

Date: October 3, 2024

Time: 9:30 a.m.

Place: Department C

Complaint Filed: January 23, 2023

Trial Date: None Set

FILED
Superior Court of California
County of Los Angeles

10/03/2024

David W. Slayton, Executive Officer / Clerk of Court

By: K. Caudill Deputy

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Judgment, the Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement, may be construed as, or may be used as, an admission of any fault, wrongdoing, omission, concession, or liability whatsoever by or against Defendants.

8. The Court approves the gross settlement amount of \$450,000. After deducting the approved amounts for attorneys' fees and costs, the service award, and settlement administration costs, the net settlement amount of \$266,563.06 will be allocated as follows: Seventy-Five Percent (75%), or approximately \$199,922.30, shall be paid to the California Labor and Workforce Development Agency, and the remaining Twenty-Five Percent (25%), or approximately \$66,640.76, shall be paid to Aggrieved Employees.

9. The Court hereby awards \$150,000 in attorneys' fees and \$15,936.94 costs to Plaintiff's Counsel, Capstone Law APC. The Court finds that the requested award of attorneys' fees is reasonable for a contingency fee in a PAGA action such as this; i.e., one-third of the common fund created by the settlement. Counsel have also established the reasonableness of the requested award of attorneys' fees via their lodestar crosscheck, and the Court finds that the attorney staffing, hours billed, and hourly rates are reasonable, and the multiplier is warranted under the circumstances.

10. The Court approves a Service Award of \$10,000 to Celeste Ramirez.

11. The Court appoints CPT Group, Inc. to serve as the Settlement Administrator, and approves Settlement Administration Costs of \$7,500.

12. This Judgment shall be binding on all Aggrieved Employees and the State of California, who are hereby barred by the doctrine of res judicata from re-litigating the Settled Claims during the Settlement Period, as those terms are defined by the Settlement. *See Arias v. Superior Court*, 46 Cal. 4th 969, 986 (2009) (holding that a judgment in a representative action brought by an aggrieved employee under PAGA is binding not only on the named employee plaintiff but also on state labor law enforcement agencies and any aggrieved employee not a party to the proceeding).

13. Without affecting the finality of the Order and Judgment, the Court shall retain exclusive and continuing jurisdiction under California Code of Civil Procedure § 664.6, over the above-captioned action and the parties for purposes of enforcing the terms of the Judgment and the Settlement.

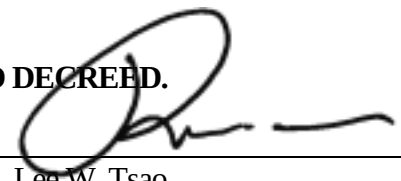
14. This document shall constitute a judgment under California Code of Civil Procedure §

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664.6.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Date 10-3-24



Hon. Lee W. Tsao
Los Angeles County Superior Court Judge
Roger Ito