

KINGSLEY & KINGSLEY, APC
ERIC B. KINGSLEY, Esq. (SBN 185123)
eric@kingsleykingsley.com
KELSEY M. SZAMET, Esq. (SBN 260264)
kelsey@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Tel: (818) 990-8300, Fax (818) 990-2903

FILED
Superior Court of California
County of Sacramento
07/09/2024
T. Shaddix, Deputy

Attorneys for Plaintiff and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

JESSE ROBLES, an individual, on behalf of
himself and other similarly situated,

PLAINTIFF,

v.

GEREMIA POOLS; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 34-2022-00329920-CU-OE-GDS

[Case Assigned for All Purposes to Hon. Jill
Talley in Dept. 23]

**~~PROPOSED~~ ORDER GRANTING
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: June 14, 2024
Time: 9:00 AM
Dept.: 23

Complaint Filed: November 17, 2022
FAC Filed: January 24, 2023
Trial Date: None Set

Reservation No. #A-3299320-001

1 **PROPOSED ORDER**

2 The Motion for Approval of Representative Action Settlement (“Motion”) came before this
3 Court, the Honorable Jill Talley, presiding. The Court, having considered the papers submitted in
4 support of the motion of the parties, **HEREBY ORDERS THE FOLLOWING:**

5 Having considered Plaintiff’s Motion, and all legal authorities and documents submitted
6 in support thereof, including the PAGA Settlement Agreement (“Agreement”), attached to the
7 Declaration of Kelsey M. Szamet as Exhibit “1”, and good cause appearing, IT IS HEREBY
8 ORDERED that Plaintiff’s Motion is GRANTED, subject to the following findings and orders:

- 9 1. The Court finds the Settlement is fair and reasonable.
- 10 2. The Court approves the Gross Settlement Amount of \$150,000.00¹.
- 11 3. The Court approves the PAGA Penalties in the amount of \$80,787.31.
- 12 4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in
13 the amount of \$60,590.48.
- 14 5. The Court approves PAGA Counsel’s request for attorney fees of \$50,000.00.
- 15 6. The court approves the PAGA Counsel’s request for reimbursement of case costs
16 in the amount of \$9,262.69.
- 17 7. The Court approves the settlement administration costs of \$4,950.00.
- 18 8. The Court approves an Enhancement Payment to Plaintiff JESSE ROBLES of
19 \$5,000.00.
- 20 9. The Parties are ordered to carry out the terms of the Agreement.
- 21 10. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction
22 over this action and the Parties and the Aggrieved Employees including after the
23 entry of this Order, to the fullest extent necessary to interpret, enforce and
24 effectuate the terms and intent of the Agreement and this Order.
- 25
- 26

27

¹ Unless otherwise defined herein, all capitalized terms shall have the meaning assigned to them
28 in the Agreement.



Jill Talley

DATED: 07/09/2024

JUDGE OF THE SUPERIOR COURT

Jill Talley

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On March 1, 2024, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER GRANTING APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

CDF LABOR LAW LLP

Cory J. Cabral
ccabral@cdfllaborlaw.com
Elizabeth Scott
escott@cdfllaborlaw.com
Gisele Mitsuk
gmitsuk@cdfllaborlaw.com
900 University Avenue, Suite 200
Sacramento, CA 95825

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 1, 2024, at Woodland Hills, California.



Michelle Tanzer