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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10 **VAN NUYS COURTHOUSE EAST**

11 ANAEE J. ZUNIGA, individually and as
12 representative of the State of California on
13 behalf of all aggrieved employees,

14 Plaintiff,

15 v.

16 DR. PATRICIA L. WALTERS, an individual
17 d/b/a TARZANA WOUND CARE CENTER,
18 and DOES 1 through 20, inclusive,

19 Defendants.

Case No. 22VECV01944

**[PROPOSED] ORDER GRANTING THE
RELIEF REQUESTED IN PLAINTIFF'S
EX PARTE APPLICATION FOR AN
ORDER (1) APPROVING THE
SETTLEMENT OF PLAINTIFF'S
INDIVIDUAL PAGA CLAIMS AGAINST
THE DEFENDANT AND DISMISSING
THOSE PAGA CLAIMS WITH
PREJUDICE AND (2) DISMISSING
PLAINTIFF'S PAGA CLAIMS ON
BEHALF OF THE OTHER ALLEGEDLY
AGGRIEVED EMPLOYEES WITHOUT
PREJUDICE**

20 The Plaintiff, Anaee J. Zuniga, has filed an Ex Parte Application for an Order (1)
21 Approving the Settlement of Plaintiff's Individual PAGA Claims Against the Defendant and
22 Dismissing Those PAGA Claims With Prejudice and (2) Dismissing Plaintiff's PAGA Claims on
23 Behalf of the Other Allegedly Aggrieved Employees Without Prejudice (hereinafter referred to as
24 "Plaintiff's Ex Parte Application"). Having considered Plaintiff's Ex Parte Application and related
25 papers filed by Plaintiff's counsel (Notice of Plaintiff's Ex Parte Application and Plaintiff's Ex
26 Parte Application, the Memorandum of Points and Authorities in support of Plaintiff's Ex Parte
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1 Application, and the Declaration of Daniel V. Santiago in support of Plaintiff's Ex Parte
2 Application), and good cause appearing for the relief requested therein,

3 **IT IS HEREBY ORDERED THAT:**

4 1. The Court hereby approves of the settlement of the Plaintiff's representative PAGA
5 claims against the Defendant on behalf of herself as an allegedly aggrieved employee of the
6 Defendant (hereinafter referred to as "Plaintiff's individual PAGA claims") for \$500 (75% of which
7 or \$375 is to be paid to the "Labor and Workforce Development Agency" ["LWDA"] and 25% of
8 which or \$125 is to be paid to the Plaintiff). Upon receipt of the settlement payments described in
9 the Settlement Agreement, Plaintiff's counsel shall promptly transfer to the LWDA and Plaintiff
10 their respective shares of the settlement of Plaintiff's individual PAGA claims against the
11 Defendant.
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13 2. The Court hereby dismisses *with* prejudice Plaintiff's individual PAGA claims
14 against the Defendant.
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16 3. The Court hereby dismisses *with* prejudice Plaintiff's individual non-PAGA claims
17 against the Defendant.
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19 4. The Court hereby dismisses *without* prejudice Plaintiff's representative PAGA
20 claims against the Defendant on behalf of the other allegedly aggrieved employees of the
21 Defendant.
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23 **IT IS SO ORDERED.**

24 Dated: _____

Judge of the Superior Court of California,
County of Los Angeles