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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SANTA BARBARA**

LUIS LOPEZ SANTOS; MAURILIO SANTIAGO GARCIA; ESTELA PONCE PEREZ; CARMEN LOPEZ SANTIAGO; CRISTINA LOPEZ SOLANO; ARTURO LOPEZ SOLANO; MARGARITO MARCELINO HERNANDEZ; an individual, on behalf of the State of California, as a private attorney general,

PLAINTIFFS,

v.

WEST COAST BERRY FARMS, LLC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

Lead Case No. 23CV01149
(Case No. 23CV00578)

[Case Assigned for All Purposes to Hon. Jed Beebe in Dept. SM 4]

**[PROPOSED] ORDER GRANTING APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT**

Date: February 4, 2027
Time: 8:30 AM
Dept.: SM 4

Complaint Filed: December 5, 2022
Trial Date: None Set

**[PROPOSED] ORDER**

The Motion for Approval of Representative Action Settlement ("Motion") came before this Court, the Honorable Jed Beebe, presiding. The Court, having considered the papers submitted in support of the motion of the parties, **HEREBY ORDERS THE FOLLOWING:**

Having considered Plaintiffs' Motion, and all legal authorities and documents submitted in support thereof, including the Representative Action Settlement Agreement ("Agreement"), attached to the Szamet Declaration as Exhibit "1", and good cause appearing, IT IS HEREBY ORDERED that Plaintiffs' Motion is GRANTED, subject to the following findings and orders:

1. The Court finds the Settlement is fair and reasonable.
2. The Court approves the Gross Settlement Amount of $400,000.00[1].
3. The Court approves the PAGA Penalties in the amount of $175,490.85.
4. The Court approves 75% of the PAGA Penalties being allocated to the LWDA in the amount of $131,618.14.
5. The Court approves 25% of the PAGA Penalties being allocated to the aggrieved employees in the amount of $43,872.71.
6. The Court approves PAGA Counsel's request for attorney fees of $133,333.33.
7. The court approves the PAGA Counsel's request for reimbursement of case costs in the amount of $58,675.82.
8. The Court approves the settlement administration costs of $22,500.00.
9. The Court approves an Enhancement Payment to Plaintiffs LUIS LOPEZ SANTOS; MAURILIO SANTIAGO GARCIA of $5,000.00 each for a total of $10,000.00.
10. The Parties are ordered to carry out the terms of the Agreement.
11. Pursuant to C.C.P §664.6, the Court shall have and retain continuing jurisdiction over this action and the Parties and the Aggrieved Employees including after the

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

entry of this Order, to the fullest extent necessary to interpret, enforce and effectuate the terms and intent of the Agreement and this Order.

**DATED:** _____ _____

**JUDGE OF THE SUPERIOR COURT**

**(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 October 26, 2026, 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:

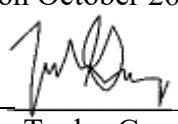
| | |
|---|---|
| **VENTURA COUNTY ASSOCIATION**<br>Robert P. Roy<br>Rob-vcaa@pacbell.net<br>Michael P. Roy<br>Mike-vcaa@pacbell.net<br>916 W. Ventura Blvd.<br>Camarillo, California 93010<br><br>**LIGHTGABLER LLP**<br>Michael H. Brody<br>mbrody@lightgablerlaw.com<br>Kathleen M. Fellows<br>kfellows@lightgablerlaw.com<br>Jason Edlinger<br>jedlinger@lightgablerlaw.com<br>760 Paseo Camarillo, Suite 300<br>Camarillo, CA 93010 | **MARTINEZ AGUILASOCHO LAW, INC.**<br>Edgar Aguilasocho<br>Mario Martinez<br>eaguilasocho@farmworkerlaw.com<br>mmartinez@farmworkerlaw.com<br>info@farmworkerlaw.com<br>P.O. Box 1998<br>Bakersfield, CA 93303 |

**[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 October 26, 2026, at West Hollywood, California.



Taylor Gregg