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

MONET L. STERLING, on behalf of herself  
and current and former aggrieved employees

Plaintiff,

vs.

DOTHAN SECURITY, INC.; and DOES 1  
to 100, inclusive,

Defendants.

Case No.: 23STCV08293

Assigned for All Purposes to:  
Hon. Bruce G. Iwasaki  
Dept. 58

**~~PROPOSED~~ ORDER GRANTING MOTION  
FOR APPROVAL OF SETTLEMENT UNDER  
PRIVATE ATTORNEY'S GENERAL ACT**

Date: January 22, 2025  
Time: 9:00 am  
Dept.: 58

**~~PROPOSED~~ ORDER GRANTING  
MOTION FOR APPROVAL OF  
PAGA SETTLEMENT**

Case No. 23STCV08293

**FILED**  
Superior Court of California  
County of Los Angeles  
01/22/2025  
David W. Stoyan, Executive Officer / Clerk of Court  
By: M. Lopez Deputy

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1 Under Labor Code section 2699(1)(2) of the Private Attorneys General Act of 2004  
2 (“PAGA”), THE Motion for Approval of Settlement under PAGA filed by Plaintiffs came before  
3 this Court on January 22, 2025, on a regularly noticed motion.

4 Plaintiffs’ operative complaint seeks civil penalties on behalf of the State of California and  
5 similarly situated aggrieved employees (the “Aggrieved Employees”), as authorized by PAGA  
6 under Labor Code § 2699, in relation to alleged violations of the predicate statutes set forth in  
7 Plaintiffs’ Operative Complaint and their letters to the Labor Workforce & Development Agency  
8 (“LWDA”) dated February 7, 2023 (Monet Sterling), March 2, 2023 (Miguel Ruiz), May 23, 2023  
9 (Andrew Tarigan), and January 16, 2024 (Carlton McGee and Ricardo Wendell) (the “PAGA  
10 Notices”), on behalf of all current and former non-exempt employees of Defendant in California  
11 from February 7, 2022 through June 11, 2024, inclusive.

12 Under PAGA, in any action brought by an aggrieved employee, the Court “shall review and approve  
13 any settlement of any civil action filed pursuant to this part.” Lab. Code section 2699 (1)(2). Accordingly the  
14 Court, having considered the proposed settlement set forth in the Settlement Agreement (attached as Exhibit  
15 1 to the Declaration of Sepideh Ardestani, filed November 25, 2024), including the proposed PAGA penalties,  
16 under Labor Code section 2699(1)(2), having considered the papers filed in support of the proposed settlement  
17 and the arguments of counsel, and good cause appearing, HEREBY ORDERS AS FOLLOWS:

- 18 1. The Court finds the instant Action presents a good faith dispute of the claims alleged;
- 19 2. The Court finds in favor of settlement approval, and therefore approves the Settlement of the  
20 above-captioned action, as set forth in the Settlement Agreement and each of the releases and other terms, as  
21 fair, just, reasonable, and adequate;
- 22 3. The Court finds further that Plaintiffs and all Aggrieved Employees are deemed to  
23 release, on behalf of themselves and their respective former and present representatives, agents,  
24 attorneys, heirs, administrators, successors, and assigns, the Released Parties from all claims for  
25 PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA  
26 Period facts stated in the Operative Complaint and the PAGA Notices..
- 27 4. The Court finds further that the foregoing release shall be binding on Plaintiffs and the State  
28 of California as to those claims brought in the Action, and may bar any claim under PAGA brought by any

1 person, including the Aggrieved Employees, on behalf of the State of California, as to the Released PAGA  
2 Claims and Released Parties.

3 5. The Parties are directed to comply with all terms of the Settlement Agreement, and Defendant  
4 is directed to make all payments required by the Settlement Agreement;

5 6. Under the Settlement Agreement, Defendant agrees to pay Eight Hundred Thirty Thousand  
6 Dollars and No Cents (\$830,000.00) (the “Gross Settlement Amount”). The Gross Settlement Amount is  
7 inclusive of payments to the LWDA and Aggrieved Employees, enhancement awards to Plaintiffs, Attorney’s  
8 Fees and Costs, and Administration costs. No portion of the Gross Settlement Amount will revert to  
9 Defendant. Plaintiffs request representative enhancement awards of \$2,500.00 each, and Plaintiffs’ Counsel  
10 request an award of attorney’s fees (total, in the aggregate for all Plaintiffs’ counsel) of \$276,666.67 and  
11 reimbursement of actual litigation expenses of \$27,653.56. Defendant does not oppose these requests. The  
12 Court finds the Gross Settlement Amount is fair, reasonable and adequate, and approves each of these  
13 payments, and directs the Settlement Administrator to make the following payments from the Gross  
14 Settlement Amount:

15 a. \$276,666.67 in attorney’s fees, including \$88,533.33 to Crosner Legal, PC, \$27,666.67 to  
16 Wilshire Law Firm, \$102,376.67 to Lavi & Ebrahimiyan, LLP, and \$58,100.00 to Mahoney Law Group;

17 b. \$27,653.56 in litigation costs, including \$11,690.05 to Crosner Legal, PC, \$3,385.71 to  
18 Wilshire Law Firm, \$6,565.75 to Lavi & Ebrahimiyan, LLP, and \$6,012.50 to Mahoney Law Group;

19 c. \$2,500.00 each to Plaintiffs, as representative enhancements for their services as the named  
20 plaintiffs in this matter; and

21 d. \$4,000.00 in administration costs to Simpluris, Inc.;

22 8. After deducting the foregoing payments, the estimated remainder of approximately  
23 \$509,179.77 shall form the Net Settlement Amount (“NSA”). Pursuant to Labor Code section 2699(i), the  
24 NSA will then be distributed 75 percent (approximately \$381,884.83) to the LWDA, and the remaining 25  
25 percent (approximately \$127,294.94) to the Aggrieved Employees on a pro rata basis, as set forth in the  
26 Settlement Agreement. The Court approves these payments, and directs the Settlement Administrator to issue  
27 checks to the LWDA and Aggrieved Employees, along with the Notice of PAGA Settlement, as set forth in  
28 the Settlement Agreement, and to otherwise carry out its duties as set forth in the Settlement Agreement.

1           8.       This document shall constitute a Judgment for purposes of California Rule of Court 3.769(h).  
2 The Court reserves exclusive and continuing jurisdiction over the Action and the Parties under Code of Civil  
3 Procedure section 664.6 and California Rule of Court 3.769(h) for the purpose of supervising implementation,  
4 enforcement, construction, administration, and interpretation of the Settlement Agreement and this Judgment.

5  
6                   **IT IS SO ORDERED AND ADJUDGED.**

7  
8 Dated: 01/22/2025





Judge of the Superior Court

Bruce G. Iwasaki / Judge