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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

JYNAE DOMONIQUE LEWIS, on behalf of herself and all others similarly situated, and on behalf of the general public Plaintiff, vs. HAYWARD HEALTH CENTER, LLC, a California Limited Liability Company, and DOES 1 through 10, inclusive, Defendants.	CASE NO.: 25CV146839 **[PROPOSED] ORDER AND JUDGMENT**

[PROPOSED] ORDER AND JUDGMENT

Having considered the Parties' PAGA Settlement Agreement (the "Settlement"), the documents and evidence in support thereof; and recognizing the disputed factual and legal issues involved in this case, the risks of further prosecution, the substantial benefits to be received by Plaintiff Jynae Domonique Lewis ("Plaintiff"), the State of California, and the Aggrieved Employees pursuant to the Settlement; and the fair, reasonable, and adequate nature of the settlement obtained as a result of good faith arm's-length negotiations between the Parties, the Court hereby makes a final ruling that the Settlement is approved pursuant to Labor Code section 2699(1). Good cause appearing therefore, the Court hereby GRANTS Approval of the Settlement of Claims under the Private Attorneys General Act between Plaintiff and Defendant HAYWARD HEALTH CENTER, LLC ("Defendant") and ORDERS as follows:

1. The "Aggrieved Employees" shall be defined as all persons employed by Defendant as an hourly-paid or non-exempt employee in California at any time during the PAGA Release Period (September 30, 2024 through August 10, 2026).

2. The Court hereby approves the Settlement as fair, reasonable, and adequate, and directs the Parties to effectuate the Settlement according to its terms.

3. Defendant shall fund the Gross Settlement Amount of $125,040.00 with the Settlement Administrator no later than 30 calendar days after the Court has entered an Order granting approval of the settlement and entered final judgment.

4. The Court hereby approves, as to the form and content, the Notice to Aggrieved Employees attached as Exhibit 8 to the Declaration of Roman Otkupman.

5. The Court hereby appoints ILYM Group Inc. ("ILYM") as the Administrator.

6. The Administrator is directed to mail the Individual PAGA Payments and the Notice to Aggrieved Employees within 30 calendar days after receipt of the Gross Settlement Amount, pursuant to the terms of the Settlement.

7. The Court finds that attorneys' fees in the amount of 33.33% of the Gross Settlement Amount ($41,675.83) for Plaintiff's Counsel, and reimbursement of litigation costs in the amount of actual costs incurred in the amount of $14,258.80 are fair, reasonable, and adequate, and orders

the Administrator to distribute these payments to Plaintiff's Counsel as provided for in the Settlement.

8. The Court approves the service payment to Plaintiff Jynae Domonique Lewis in the amount of $7,500.00.

9. The Court orders that the Administrator shall be paid $3,650.00 for all of its work to be done until the completion of this matter.

10. The Court finds that the amount of $37,670.99, representing 65% of the $57,955.37 allocated as PAGA civil penalties under the Settlement, to be paid to the California Labor and Workforce Development Agency ("LWDA") as provided for by the Settlement, is fair, adequate, and reasonable, and orders that payment be made to the LWDA in accordance with the terms of the Settlement. The remaining amount of $20,284.38, representing 35% of the PAGA civil penalties under the Settlement shall be distributed amongst the Aggrieved Employees pursuant to the Settlement.

11. The Court approves the scope of the release as set forth in the Settlement. Upon the Effective Date and the full funding of the Gross Settlement Amount by Defendant, all Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, administrators, successors and assigns, the Released Parties from all claims for PAGA Penalties that were alleged, or reasonably could have been alleged, based on the facts and allegations in the Operative Complaint that are alleged to have occurred during the PAGA Release Period and the underlying PAGA Notice(s), including but not limited to: Lab. Code §§ 201-203, 204(a), 204(b), 210, 218, 226(a), 226(e), 226.7, 510, 512, 558, 1194, 1194.2, and 2802.

12. Upon entry of this Order, the Court hereby enters judgment pursuant to the terms of the Settlement and all terms of the Settlement are hereby incorporated into this Order and Judgment. All definitions in the Settlement shall apply to those same terms used anywhere in this Order and Judgment.

17. The Court sets a Final Accounting hearing _____ at _____ in Department 21. The disbursement declaration shall be filed by no later than _____.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Dated: _____

_____
HON. SOMNATH RAJ CHATTERJEE
JUDGE OF THE SUPERIOR COURT