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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

CASSANDRA WALKER, FRANCES PARDO,
CHRISTIAN VERDUZCO, COLLIN JOHNSON,
and HANNAH GANSEN, as private attorneys
general,

Plaintiffs,

vs.

FITNESS ALLIANCE, LLC, a California limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 37-2023-00020191-CU-OE-CTL

[Hon. Joel R. Wohlfeil, Department C-73]

**[PROPOSED] ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND FINAL JUDGMENT**

Date: November 7, 2024
Time: 9:00 a.m.
Department: C-73

On October 16, 2024, Plaintiffs Cassandra Walker, Frances Pardo, Christian Verduzco, Collin Johnson, and Hannah Gansen filed a motion for an Order Granting Approval of PAGA Settlement. On November 7, 2024, a hearing was held before this Court.

After considering the papers and evidence, arguments of counsel, and all other matters presented to the Court, and having taken the matter under submission, **IT IS HEREBY ORDERED AND ADJUDGED** as follows:

1. The motion for approval of the Labor Code Private Attorneys General Act of 2004 (“PAGA”) settlement is granted. Plaintiffs have fairly and adequately protected the interests of the State, and Plaintiffs’ Counsel are qualified to serve as counsel for the Plaintiffs in their individual and representative capacities. The Joint Stipulation of PAGA Settlement (the “Agreement”) submitted by the Parties appears to be fair, adequate, and reasonable in light of PAGA’s policies and in furtherance of PAGA’s purposes.

2. The Parties are hereby ordered to carry out the terms of the Agreement.

3. Pursuant to the terms of the Agreement, Defendant, Fitness Alliance, LLC, is hereby ordered to deposit the \$650,000.00 Settlement Amount with Phoenix Settlement Administrators (the “Administrator”).

4. Within 14 days after receipt of the Settlement Amount, the Administrator shall distribute the Settlement Amount as follows:

- \$216,666.67 as Attorneys’ Fees to Plaintiffs’ Counsel;
- \$30,000.00 as Costs to Plaintiffs’ Counsel;
- \$11,500.00 as Administration Costs to the Administrator;
- \$10,000.00 as a General Release Payment to each Plaintiff;
- \$256,375.00 as PAGA Penalties to the Labor and Workforce Development Agency; and
- \$85,458.33 as PAGA Penalties to Aggrieved Employees based on the number of relevant pay periods worked by each Aggrieved Employee.

5. The Court grants approval of the settlement in accordance with the terms of the Agreement and this Order.

1 6. The Court hereby enters Final Judgment. Without affecting the finality of the Order and
2 Final Judgment filed herewith, the Court reserves continuing jurisdiction over the Action, Plaintiffs, and
3 Defendant for the purposes of (i) the interpretation and enforcement of the terms of the settlement, (ii)
4 settlement administration matters, and (iii) post-Judgment matters as may be appropriate under Court
5 rules or as set forth in the Agreement.

6 7. Except as otherwise provided in the Agreement, the Parties are to bear their own costs
7 and attorneys' fees.

8 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

9 DATED: _____, 2024

JUDGE OF THE SUPERIOR COURT