

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Edward W. Choi, Esq. SBN 211334 FIRM NAME: LAW OFFICES OF CHOI & ASSOCIATES, APLC STREET ADDRESS: 515 S. Figueroa St. Suite 1250 CITY: Los Angeles TELEPHONE NO.: 213-381-1515 EMAIL ADDRESS: edward.choi@choiandassociates.com ATTORNEY FOR (name): Plaintiff and the Aggrieved Employees SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 1225 Fallon Street MAILING ADDRESS: CITY AND ZIP CODE: Oakland, CA 94612 BRANCH NAME: René C. Davidson Courthouse	STATE BAR NUMBER: 211334 FOR COURT USE ONLY
PLAINTIFF/PETITIONER: MARION TELLEZ DEFENDANT/RESPONDENT: MERCY HOUSING MANAGEMENT GROUP	
NOTICE OF ENTRY OF JUDGMENT OR ORDER (Check one): ☒ UNLIMITED CASE (Amount demanded exceeded \$35,000) ☐ LIMITED CASE (Amount demanded was \$35,000 or less)	CASE NUMBER: 23CV031003

TO ALL PARTIES :

1. A judgment, decree, or order was entered in this action on (date): 2/24/2025
2. A copy of the judgment, decree, or order is attached to this notice.

Date: 2/25/2025

Edward W. Choi

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

(SIGNATURE)

PLAINTIFF/PETITIONER: MARION TELLEZ
 DEFENDANT/RESPONDENT: MERCY HOUSING MANAGEMENT GROUP

CASE NUMBER:
 23CV031003

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):
 515 S. Figueroa St. Suite 1250, Los Angeles, CA 90071

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):
 - a. ☐ deposited the sealed envelope with the United States Postal Service.
 - b. ☒ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:
 - a. on (*date*): 2/25/2025
 - b. from (*city and state*): Los Angeles, CA

4. The envelope was addressed and mailed as follows:

a. Name of person served: Marc L. Jacuzzi / Sarah E. Lucas Street address: 2175 N. California Blvd., Suite 710 City: Walnut Creek State and zip code: CA 94596 b. Name of person served: Street address: City: State and zip code:	c. Name of person served: Street address: City: State and zip code: d. Name of person served: Street address: City: State and zip code:
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☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached: 4

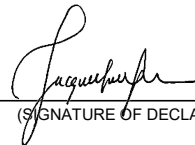
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2/25/2025

Jacqueline Park

(TYPE OR PRINT NAME OF DECLARANT)





(SIGNATURE OF DECLARANT)

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff and the Aggrieved Employees
(Additional Counsel on Next Page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

MARION TELLEZ, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

v.

MERCY HOUSING MANAGEMENT GROUP,
a corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 23CV031003

[Assigned for all purposes to the Hon. Mark
Fickes in Department 518]

~~PROPOSED~~ JUDGMENT

Date: January 23, 2025
Time: 2:30 pm
Dept.: 518

Reservation ID: 119802275085

~~PROPOSED~~ JUDGMENT

Plaintiff Marion Tellez's ("Plaintiff") Motion to Approve the Private Attorney General Act Settlement Agreement and Release ("Settlement" or "Settlement Agreement") came regularly for hearing on January 23, 2025. Prior to the hearing, the Court issued a tentative ruling, which was uncontested and affirmed on January 23, 2025. Attached hereto as Exhibit A is the Court's January 23, 2025 Order which is incorporated by reference as set forth herein.

NOW THEREFORE, IT IS HEREBY ADJUDGED AS FOLLOWS:

1. Pursuant to Labor Code § 2699(l)(2), the Court approves the Settlement Agreement executed by Plaintiff and Defendant and filed with this Court, which is incorporated herein by this reference as though set forth in full, including the settlement administration and release of claims. All defined terms contained herein shall have the same meanings as set forth in the Settlement Agreement.

2. The Court finds that the Labor & Workforce Development Agency ("LWDA") has been given timely and proper notice of the Settlement Agreement pursuant to the Labor Code Private Attorney General Act ("PAGA").

3. The Parties are hereby ordered to carry out the terms of the Settlement Agreement. Defendant is hereby ordered to fund the Maximum Settlement Amount of \$290,000.00, 14 days after the Effective Date.

4. Pursuant to the terms of the Settlement Agreement and Labor Code § 2699(i), the Maximum Settlement Amount of \$290,000.00 shall be distributed as follows:

- \$5,000.00 to Plaintiff Marion Tellez for acting as a named plaintiff and in exchange for a general release and waiver of Civil Code § 1542;
- \$96,666.67 to Plaintiff's Counsel as attorneys' fees;
- \$9,313.44 to Plaintiff's Counsel as costs;

- \$6,500.00 to Xpand Legal Consulting as the Settlement Administrator, who is hereby ordered to administer the Settlement;
- The remainder, or the Net PAGA Settlement Amount, after the above deductions shall be distributed 75% (\$129,389.92.00) to the Labor & Workforce Development Agency and 25% (\$43,129.97) to the Aggrieved Employees based on the formula set forth in the Settlement Agreement;
- Uncashed funds will be sent to Legal Aid at Work, a Cy Pres, in accordance with California Code of Civil Procedure § 384

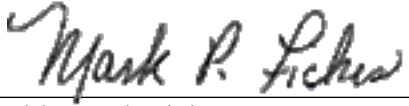
5. JUDGMENT IS ENTERED thereon pursuant to the terms of the Settlement Agreement. Other than as expressly provided in the Settlement Agreement, both Parties shall bear their own costs and fees.

6. Pursuant to Code of Civil Procedure § 664.6, this Court shall have and retain continuing jurisdiction over this action to enforce the terms of the Parties' Settlement Agreement and sets a Compliance Hearing for September ¹⁷~~24~~, 2025 at 2:30 p.m. in Department 518.

7. Pursuant to Labor Code § 2699(1)(3), Plaintiff shall submit a copy of this Order and Judgment to the LWDA within 10 days of entry of this Order and Judgment.

IT IS SO ORDERED AND ADJUDGED.

DATED: 02/24/2025



Honorable Mark Fickes
Judge of the Superior Court
Mark Fickes / Judge

PROOF OF SERVICE

I am employed in the County of Los Angeles; I am over the age of 18 years and not a party to the within action; my business address is 515 S. Figueroa St. Suite 1250, Los Angeles, California 90071.

On January 31, 2025, I served the foregoing document(s) described as: **[PROPOSED] JUDGMENT**, on the interested parties in this action by placing a true copy thereof, in a sealed envelope(s) addressed as follows:

Marc L. Jacuzzi
mjacuzzi@sgijlaw.com
Sarah E. Lucas
slucas@sgijlaw.com
SIMPSON, GARRITY, INNES & JACUZZI, P.C.
2175 N. California Blvd., Suite 710
Walnut Creek, CA 94596

Larry W. Lee
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
lwlee@diversitylaw.com
olympia@diversitylaw.com
erika@diversitylaw.com
calendar@diversitylaw.com

William L. Marder
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
bill@polarislawgroup.com

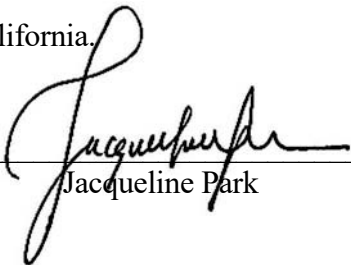
Dennis S. Hyun
HYUN LEGAL, APC
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
dhyun@hyunlegal.com

 X **BY ELECTRONIC SERVICE**

I caused such document to be served on the offices of the addressees via electronic service.

 X **(State)** I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 31, 2025, at Los Angeles, California.



Jacqueline Park

PROOF OF SERVICE

I am employed in the County of Los Angeles; I am over the age of 18 years and not a party to the within action; my business address is 515 S. Figueroa St. Suite 1250, Los Angeles, California 90071.

On February 25, 2025, I served the foregoing document(s) described as: **NOTICE OF ENTRY OF JUDGMENT OR ORDER**, on the interested parties in this action by placing a true copy thereof, in a sealed envelope(s) addressed as follows:

Marc L. Jacuzzi
mjacuzzi@sgijlaw.com
Sarah E. Lucas
slucas@sgijlaw.com
SIMPSON, GARRITY, INNES & JACUZZI, P.C.
2175 N. California Blvd., Suite 710
Walnut Creek, CA 94596

Larry W. Lee
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
lwlee@diversitylaw.com
olympia@diversitylaw.com
erika@diversitylaw.com
calendar@diversitylaw.com

William L. Marder
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
bill@polarislawgroup.com

Dennis S. Hyun
HYUN LEGAL, APC
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
dhyun@hyunlegal.com

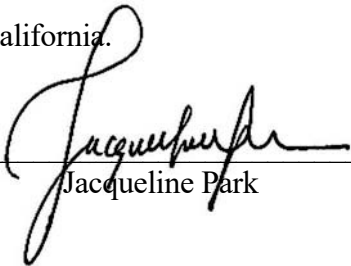
Via Online Upload
California Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
PAGA@dir.ca.gov

 X **BY ELECTRONIC SERVICE**

I caused such document to be served on the offices of the addressees via electronic service.

 X **(State)** I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2025, at Los Angeles, California.



Jacqueline Park