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FILED
Superior Court of California
County of Los Angeles
05/15/2025

David W. Stryker, Executive Officer / Clerk of Court
By: C. Crow Deputy

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

CARLOS GUILLERMO PEREZ
GRAJEDA, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ROCKET LAB USA, INC.; and DOES 1
through 20, inclusive,

Defendants.

Case No. 23STCV12065

*Assigned for All Purposes to:
Judge Upinder Kalra
Dept. 51*

**~~PROPOSED~~ ORDER GRANTING MOTION
FOR APPROVAL OF PAGA SETTLEMENT
AND ENTERING JUDGMENT**

1 The Court has received and considered the Motion for Approval of PAGA Settlement of
2 Plaintiff Carlos Guillermo Perez Grajeda, as an individual, and on behalf of the people of the
3 State of California and as an “aggrieved employee” acting as a private attorney general under the
4 Labor Code Private Attorneys General Act of 2004, § 2699, *et seq.* (“PAGA”) and Defendant
5 Rocket Lab USA, Inc. in the above-captioned action.

6 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

7 The Judgment incorporates by reference the definitions in the PAGA SETTLEMENT
8 AGREEMENT (the “Settlement”), a copy of which is attached as Exhibit 1 to the Declaration of
9 Kristy R. Connolly in Support of Motion for Approval of PAGA Settlement, and all terms defined
10 therein shall have the same meaning as set forth in the Settlement.

11 The Court hereby approves the Parties’ proposed Settlement and hereby enters FINAL
12 JUDGMENT based on the terms set forth in the Parties’ Settlement in favor of Plaintiff and the
13 Aggrieved Employees in the amount of \$175,000. Of this, \$ 58,333.33 is awarded as attorney fees
14 paid to Plaintiff’s Counsel, \$ 19,724.95 is awarded as costs paid to Plaintiff’s Counsel, and
15 \$3,500.00 is awarded as administrative costs paid to the Settlement Administrator. Of the
16 remaining Net Settlement Amount, 75% shall be paid to the Labor and Workforce Development
17 Agency and 25% shall be paid to the Aggrieved Employees as set forth in the Settlement.

18 Upon the date Defendant fully funds the Gross Settlement Amount, Plaintiff and all
19 Aggrieved Employees will be deemed to have released the Released Parties from all claims for
20 PAGA penalties arising during the PAGA Period that were alleged, or reasonably could have
21 been alleged, based on the facts stated in the Operative Complaint and the PAGA Notices, as
22 provided in the Settlement.

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1 This Judgment is intended to be a final disposition in its entirety of the above captioned
2 action. Without affecting the finality of this judgment in any way, the Court retains jurisdiction
3 of all matters relating to the interpretation, administration, implementation, effectuation, and
4 enforcement of the Settlement pursuant to C.C.P. § 664.6.

5 IT IS SO ORDERED.

6
7 Dated: 05/15/2025 _____



A handwritten signature in black ink, appearing to read "Upinder S. Kalra", is written over a horizontal line.

8 Hon. Upinder Kalra Upinder S. Kalra / Judge
9 Judge of the Superior Court
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