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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 FOR THE COUNTY OF LOS ANGELES

14
15 JOSE ANDRADE, an individual, on behalf of
16 themselves and all others similarly situated and
the general public,

17 Plaintiff,

18 v.

19 ACE ATTORNEY SERVICES, INC., a
20 California corporation; and DOES 1 through 10,
inclusive,

21 Defendants.
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Case No. 23STCV21822

**[PROPOSED] ORDER APPROVING THE
PARTIES' PAGA SETTLEMENT
AGREEMENT AND JUDGMENT**

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Judgment, the Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement, may be construed as, or may be used as, an admission of any fault, wrongdoing, omission, concession, or liability whatsoever by or against Defendant.

8. The Court approves the gross settlement amount of \$185,000. After deducting the approved amounts for attorneys' fees and costs, service award, and settlement administration costs, the net settlement amount of \$96,700 will be allocated as follows: Seventy-Five Percent (75%), or approximately \$72,525, shall be paid to the California Labor and Workforce Development Agency, and the remaining Twenty-Five Percent (25%), or approximately \$24,175, shall be paid to Aggrieved Employees.

9. The Court hereby awards a combined total of \$64,750 in attorneys' fees and \$15,000 costs to Plaintiff's Counsel, Boyamian Law, Inc. and Capstone Law APC.

10. The Court approves a Service Award of \$5,000 to Jose Andrade.

11. The Court appoints ILYM Group, Inc. to serve as the Settlement Administrator, and approves Settlement Administration Costs of \$3,550.

12. This Judgment shall be binding on all Aggrieved Employees and the State of California, who are hereby barred by the doctrine of res judicata from re-litigating the Settled Claims during the Settlement Period, as those terms are defined by the Settlement. *See Arias v. Superior Court*, 46 Cal. 4th 969, 986 (2009) (holding that a judgment in a representative action brought by an aggrieved employee under PAGA is binding not only on the named employee plaintiff but also on state labor law enforcement agencies and any aggrieved employee not a party to the proceeding).

13. Without affecting the finality of the Order and Judgment, the Court shall retain exclusive and continuing jurisdiction under California Code of Civil Procedure § 664.6, over the above-captioned action and the parties for purposes of enforcing the terms of the Judgment and the Settlement.

14. This document shall constitute a judgment under California Code of Civil Procedure § 664.6.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Date _____

Hon. Kerry R. Bensinger
Los Angeles County Superior Court Judge