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Attorneys for Defendants
HIGH STYLE INC., and
MAHMOOD ZEBARJEDI

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Attorney for Plaintiff
TERESA VILLEGAS CASTILLO

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

TERESA VILLEGAS CASTILLO, an individual	)	Case No.: 23STCV18219
Plaintiff,	)	
vs.	)	JOINT STIPULATION RE: COURT
HIGH STYLE INC., a California corporation;	)	APPROVAL OF PAGA PENALTIES
MAHMOOD ZEBARJEDI, an individual; and	)	PURSUANT TO <i>LABOR CODE</i> §2699
DOES 1 through 20, inclusive,	)	
Defendants.	)	

This Stipulation is made and entered into by Plaintiff TERESA VILLEGAS CASTILLO (“Plaintiff”) and Defendants HIGH STYLE INC. (“High Style”) and MAHMOOD ZEBARJEDI (“Zebarjedi”)(High Style and Zebarjedi are collectively referred to herein as “Defendants”), by and through their respective attorneys, with reference to the following facts:

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1 WHEREAS, Plaintiff previously worked for High Style;

2 WHEREAS, on or about July 28, 2023, Plaintiff filed with the Labor and Workforce Development
3 Agency (“LWDA”) a notice of Labor Code Violations Pursuant to California Labor Code Section 2699
4 *et seq.* (the “PAGA Notice”) alleging wage and hour violations by Defendants including misclassification,
5 failure to pay overtime, failure to provide meal and rest periods, and failure to provide accurate itemized
6 wage statements, among other related claims.

7 WHEREAS, Plaintiff filed this legal action against Defendants on or about August 1, 2023
8 alleging wage and hour violations by Defendants.

9 WHEREAS, *Labor Code* §2699.3(l) states that the Court shall review and approve any penalties
10 sought as part of a proposed settlement agreement.

11 WHEREAS, Defendant at all times has disputed and denied that it was liable for any penalties
12 under *Labor Code* §2699.

13 WHEREAS, Plaintiff and Defendant have entered into a Settlement Agreement, pursuant to which,
14 among other things, Plaintiff has agreed to dismiss the Complaint with prejudice, and included a mutual
15 general release of claims in exchange for confidential consideration. Any and all release of PAGA claims
16 shall be limited to Plaintiff’s individual PAGA claims. No PAGA claims of any other putative aggrieved
17 employees, if any, shall be deemed released.

18 WHEREAS, the parties’ Settlement Agreement is contingent on the Court approving the dismissal
19 of Plaintiff’s *Labor Code* §2699 claims.

20 WHEREAS, the parties believe that the confidential settlement consideration received pursuant to
21 the Settlement Agreement represents a reasonably discounted value based on the potential value of
22 Plaintiff’s individual PAGA and non-PAGA claims, costs, and attorneys fees.

23 WHEREAS, in an effort to resolve this matter, and in recognition that Plaintiff’s PAGA claims
24 were contested, Plaintiff and Defendant hereby stipulate that \$2,000 of the total settlement will be
25 allocated to PAGA penalties.

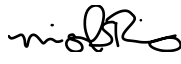
26 WHEREAS, pursuant to *Labor Code* §2699(i), Plaintiff should be awarded twenty-five percent
27 (25%) of the PAGA penalties due, and the State of California should be awarded seventy-five percent
28 (75%) of the PAGA penalties due.

1 THEREFORE, the parties jointly stipulate and request that the Court grant approval of Plaintiff's
2 dismissal of the *Labor Code* §2699 claims with \$2,000 allocated to penalties pursuant to PAGA (with
3 \$666.66 plus \$75.00 corresponding to Plaintiff's Attorneys' PAGA Fees and Costs, \$314.59 (25%)
4 corresponding to Plaintiff, and \$943.75 corresponding to the State of California).

5 THEREFORE, THE PARTIES FURTHER STIPULATE that, provided Defendant is not in default
6 of its obligations under the terms of the Settlement Agreement, Plaintiff agrees to send the total sum of
7 \$943.75 directly to California's Labor and Workforce Development Agency within 90 days of the Court's
8 approval of this order, and to file with the Court a declaration stating that the State's portion of the PAGA
9 penalty has been tendered to the State.

10
11 DATED: November 13, 2023

LAW OFFICES OF MIGUEL S. RAMIREZ

12
13 By: 
Miguel S. Ramirez, Esq.

14 Attorneys for Defendants
15 HIGH STYLE INC., and
MAHMOOD ZEBARJEDI

16 DATED: November 13, 2023

SIRMABEKIAN LAW FIRM, PC

17
18 By: 
Sarkis Sirmabekian, Esq.

19
20 Attorneys for Plaintiff
TERESA VILLEGAS CASTILLO

PROOF OF SERVICE
(§ 1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am a citizen of the United States of America; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 3435 Wilshire Boulevard, Suite 1710, Los Angeles, California 90010.

On the below-indicated date, I served the following document:

JOINT STIPULATION RE: COURT APPROVAL OF PAGA PENALTIES PURSUANT TO LABOR CODE §2699

on the interested parties in said action by placing:

___X___ a true and correct copy,

and addressed as set forth on the attached Service List and delivered by one or more of the means set forth below:

☒ **BY ELECTRONIC SERVICE IN LIEU OF SERVICE BY MAIL, EXPRESS MAIL, OVERNIGHT DELIVERY, OR FACSIMILE TRANSMISSION:** In accordance with California Code of Civil Procedure section 1010.6, I caused the document to be sent to the person(s) below at the e-mail address(es) listed below.

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

EXECUTED: November 15, 2023
At Los Angeles, California

Grigor Gregg Sirmabekhian
Grigor Gregg Sirmabekhian

[SERVICE LIST ON THE FOLLOWING PAGE]

SERVICE LIST

Miguel S. Ramirez, Esq. [SBN 214341] Law Offices of Miguel S. Ramirez 9171 Wilshire Blvd Ste 500 Beverly Hills, California 90210 Email: miguel@miguelramirezlaw.com	<i>Attorney for Defendants HIGH STYLE INC. and MAHMOOD ZEBARJEDI</i>
Labor and Workforce Development Agency ("LWDA") Department of Industrial Relations Attn. PAGA Administrator 1515 Clay Street, Ste. 801 Oakland, California 94612	<i>Labor and Workforce Development Agency: filed/served online at:</i> <u>https://www.dir.ca.gov/Private- Attorneys-General-Act/Private-Attorneys- General-Act.html</u>