

Eric K. Yaeckel CSB No. 274608
yaeckel@sullivanlawgroupapc.com
Ryan T. Kuhn CSB No. 324538
ryan@sullivanlawgroupapc.com
SULLIVAN & YAECKEL LAW GROUP, APC
2330 Third Avenue
San Diego, CA 92101
(619) 702-6760; Fax: (619) 702-6761

Attorneys for Plaintiff STEVEN JENKINS in a
Representative capacity only and on behalf of other
members of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

STEVEN JENKINS in a Representative capacity
only and on behalf of other members of the general
public,

Plaintiff,

v.

NIVA LABS, LLC, a California Limited Liability
Company; BRIANA B. CHHIN, an Individual;
SOKOUN CHHIN, an Individual; and JOSHUA
SYNDER, an Individual; and DOES 1 through 10,
Inclusive.

Defendants.

Case No. 23CHCV02971

**[PROPOSED] ORDER APPROVING
PAGA SETTLEMENT AGREEMENT
AND DISMISSING PAGA CLAIMS
WITH PREJUDICE**

1 **[PROPOSED] ORDER**

2 Having received the Parties' Stipulation and PAGA Settlement ("the Stipulation") and good
3 cause therefore:

4 It is HEREBY ORDERED that:

5 1. The terms in this Order shall have the same meaning as the defined terms in the
6 Stipulation.

7 2. The Court finds the Stipulation and Settlement was entered into in good faith, that the
8 Settlement is fair, reasonable, and adequate, and that the Settlement satisfies the standards and
9 applicable requirements for approval of PAGA representative actions under California law.

10 3. The Parties' Stipulation and PAGA settlement is hereby APPROVED pursuant to
11 California Labor Code Section 2699(1).

12 4. The Court approves the payments to be paid to the PAGA Employees and the State of
13 California as set forth in the Stipulation pursuant to California Labor Code Section 2699(1). The Court
14 further approves the payments to Plaintiff's counsel for attorneys' fees and costs, as set forth and
15 specified in the Stipulation.

16 5. As the date of this Order, Plaintiff, the PAGA Employees, the LWDA, and Defendant
17 shall be bound by the Stipulation and Settlement. The "PAGA Period" shall run from July 26, 2022,
18 through May 10, 2024. All non-exempt employees employed by Niva Labs, LLC during the PAGA
19 Period are "PAGA Employees."

20 6. Upon funding of the Total Settlement Amount after the Effective Date, Defendants and
21 Released Parties are hereby released from the Released Claims in accordance with the terms of the
22 Stipulation and Settlement during the PAGA period from July 26, 2022, through May 10, 2024.

23
24 7. This action is hereby DISMISSED WITH PREJUDICE.

25
26
27 ///

1 8. The Court shall retain jurisdiction with respect to all matters related to the interpretation and
2 enforcement of the Parties' Stipulation and Settlement.

3
4 **IT IS SO ORDERED.**

5
6 Dated: _____

7 HONORABLE SANDWIG MELVIN
8 JUDGE OF THE SUPERIOR COURT
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28