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12 Attorneys for Defendants
SIDNEY WAGNER, GARY WAGNER, and
13 JOAN PICK

14 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

15 COUNTY OF SAN DIEGO

16 OLIVIA AGUILAR,

17 Plaintiff,

18 v.

19 SIDNEY WAGNER; GARY WAGNER;
20 JOAN PICK; and DOES 1-100, inclusive,

21 Defendants.

22 SIDNEY WAGNER, by and through his
23 attorney in fact, LISA PICK; GARY
WAGNER; and JOAN PICK

24 Cross-Complainants,

25 vs.

26 OLIVIA AGUILAR.; and DOES 1 - 50,
27 inclusive,

28 Cross-Defendants.

CASE NO. 37-2023-00029645-CU-WT-NC

**[PROPOSED] ORDER GRANTING JOINT
STIPULATION RE: PAGA SETTLEMENT
APPROVAL AND DISMISSAL OF THE
ACTIONS**

Complaint filed: July 14, 2023

Trial Date: February 21, 2024

PROPOSED ORDER

The Court, having considered the parties' **JOINT STIPULATION RE: PAGA SETTLEMENT APPROVAL AND DISMISSAL OF THE ACTIONS** ("Stipulation") and Confidential Settlement Agreement and General Release ("Agreement"), and good cause having been shown, hereby GRANTS the Stipulation and further ORDERS that:

- (1) The settlement of the individual PAGA claims of Plaintiff Olivia Aguilar ("Plaintiff") in the First Amended Complaint is approved pursuant to California Labor Code Section 2699(l)(2) and payment to the Labor Workforce Development Agency shall be made in accordance with the Agreement;
- (2) Plaintiff's individual claims (including her individual claims under PAGA) are dismissed with prejudice;
- (3) Plaintiff's PAGA claims as to allegedly aggrieved employees other than Plaintiff are dismissed without prejudice;
- (4) The claims of Cross-Complainants Sidney Wagner, Gary Wagner, and Joan Pick in the Cross Complaint are dismissed with prejudice;
- (5) The foregoing results in a dismissal of both actions (the First Amended Complaint and the Cross Complaint) in their entirety; and
- (6) The Court shall retain jurisdiction over the parties to enforce the terms of the Agreement until performance in full of the terms of the Agreement pursuant to California Code of Civil Procedure Section 664.6.

IT IS SO ORDERED.

DATED: _____

JUDGE OF THE SUPERIOR COURT