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SUPERIOR COURT OF THE STATE OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO
UNLIMITED JURISDICTION

VINCENT WILLIAMS, an individual,

Plaintiff,

v.

AUTO-CHLOR SYSTEM OF NORTHERN
CALIFORNIA, INC., a California
corporation; AUTO-CHLOR SYSTEM, LLC,
a Delaware limited liability company; and
DOES 1-25, inclusive,

Defendants.

Case No. CGC-23-608789

**[PROPOSED] ORDER APPROVING
SETTLEMENT OF LABOR CODE §2698,
et seq. PRIVATE ATTORNEYS GENERAL
ACT (“PAGA”) CLAIMS**

Date: September 14, 2026
Dept.: 301
Time: 9:00 a.m.

On September 14, 2026, at 9:00 a.m., or as soon thereafter as the matter could be heard, in Department 301 of this Court, this motion came on regularly for hearing. All parties were represented by counsel. After briefing and argument, the Court rules as follows:

On August 12, 2026, Plaintiff filed an unopposed Motion for Approval of Settlement of Labor Code Section 2698, *et. seq.*, Private Attorneys General Act (“PAGA”) Claims and supporting documentation. The Court received and considered Plaintiff’s Motion, the declaration and exhibits in support thereof, the Settlement Agreement, and other evidence and the arguments

1 of counsel, and good cause appearing, the Motion for Approval of Settlement of Labor Code
2 Section 2698, *et. seq.*, Private Attorneys General Act (“PAGA”) Claims is hereby **GRANTED**.

3 **THE COURT FURTHER ORDERS AS FOLLOWS:**

4 1. California Labor Code section 2699(s)(2) requires that the “superior court shall
5 review and approve any settlement of any civil action filed pursuant to” the PAGA. Because the
6 Court finds the parties' settlement to have been agreed upon only after extensive and costly
7 investigation, arms-length negotiations in mediation, and in an attempt to avoid further delays and
8 costs, the Court grants approval of the terms and procedures set forth in the Settlement Agreement
9 attached as Exhibit B to the Declaration of John A. Lofton in Support of Plaintiff’s Motion for
10 Approval of Settlement of Labor Code Section 2698, *et. seq.*, Private Attorney’s General Act
11 Claims. The Settlement Agreement is incorporated by reference in its entirety, as if stated here in
12 full.

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14 2. The Court finds that the Settlement is fair, reasonable, and adequate in all respects.
15 The Court finds the Settlement was reached following diligent discovery and investigation
16 conducted by counsel for all parties, and the Settlement is a result of adversarial, arm’s-length
17 negotiation between the parties.

18 3. The Court, therefore, approves this Settlement as set forth in the Settlement
19 Agreement.

20 4. Section 2699(k)(1) of the PAGA provides that an employee who prevails in any
21 action under the PAGA shall be entitled to an award of reasonable attorney’s fees and costs.
22 Pursuant to section 2699(k)(1), and the equitable common fund fee-spreading doctrine as
23 discussed in Lafitte v. Robert Half Int’l, 1 Cal.5th 480, 486, 503 (2016), the Court approves the
24 request by Plaintiff’s Counsel for attorney’s fees in an amount of 35% of the Gross Settlement
25 Amount, which is \$49,000.00.

26 5. Pursuant to Section 2699(k)(1), the Court also finds the litigation costs sought by
27 Plaintiff in the amount of \$23,971.19 are reasonable expenditures that are awarded.
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1 6. The Court approves Plaintiff's request for a Service Award in the amount of
2 \$5,000.00. The declaration of Plaintiff's Counsel supports that Plaintiff provided valuable
3 assistance in the prosecution of the case. The Court finds the incentive payment to be fair and
4 reasonable compensation based on the evidence presented.

5 7. The Court appoints CPT Group, Inc., as Settlement Administrator. Based on the
6 evidence submitted, the Court finds that CPT Group, Inc. is experienced in claims administration
7 and competent to perform the tasks required. The Court approves the administration costs of up to
8 \$7,000.00.

9 8. The Court approves the deadlines set forth in the Settlement Agreement for
10 administration of the Settlement.

11 9. As of the Effective Date, the Plaintiff and all PAGA Employees are bound by the
12 release of Private Attorneys General Act claims contained in the Settlement Agreement.

13 10. The Settlement Agreement and this Order are binding on, and have res judicata and
14 preclusive effect in, all pending and future lawsuits or other proceedings: (i) that are maintained by
15 or on behalf of the named Plaintiff, any PAGA Employee, or their respective representatives,
16 agents, attorneys, heirs, administrators, successors, assigns, and/or anyone claiming through them
17 or acting or purporting to act for them or on their behalf, and (ii) encompass the claims released in
18 the Settlement Agreement, regardless of whether the Plaintiff or PAGA Employee previously
19 initiated or subsequently initiates individual litigation or other proceedings encompassed by
20 Settlement Agreement, and even if such PAGA Employee never received/receives notice of this
21 Action or this proposed Settlement.

22 11. Upon entry of this Order, the Parties shall effectuate all terms of the Settlement
23 based on the provisions and timelines set forth in the Settlement Agreement.

24 12. Without affecting the finality of this Order in any respect, pursuant to Code of Civil
25 Procedure §664.6, the Court retains jurisdiction over this action, and the parties thereto, for the
26 purposes of: (a) the implementation and enforcement of the Settlement Agreement until each and
27 every act agreed to be performed by the parties to the Settlement Agreement shall have been
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1 performed; (b) any other action necessary to conclude and implement the Settlement Agreement;
2 and (c) the construction and interpretation of the Settlement Agreement.

3 14. Any residual funds remaining after the expiration date of the check cashing period
4 shall be distributed to the DIR Unclaimed Property Fund.

5 15. The Court sets a compliance hearing for _____ at
6 _____ a.m. in Dept. ____ of this Court.

7 16. Plaintiff is directed to submit a copy of this Order to the Labor and Workforce
8 Development Agency within ten days of entry.
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10 **IT IS SO ORDERED.**
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12 Date: _____, 2026

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14 Judge of the Superior Court
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