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FILED
San Diego Superior Court

MAY 01 2025

Clerk of the Superior Court
By: B. Orihuela, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO-CENTRAL DIVISION

ADRIAN MORALES, an individual as
the State of California's designated
proxy under the Private Attorneys
General Act (PAGA) and on behalf of
others,

Plaintiffs,

vs.

LVMH FRAGRANCE BRANDS US
LLC, a Delaware corporation; and
DOES 1 through 50,

Defendants.

) Case No.: 37-2023-00041397-CU-OE-
) CTL

) Judge: Hon. Wendy M. Behan
) Dept.: C-66

) ~~PROPOSED~~ ORDER

1 **~~PROPOSED~~ ORDER**

2 WHEREAS, on May 1, 2025, at 8:30 a.m., Plaintiff Adrian Morales,
3 individually and on behalf of himself, the State of California as its designated proxy,
4 and Aggrieved Employees (collectively, the “Plaintiffs”) in the above referenced
5 action, appeared ex parte through counsel in the above-captioned action to seek an
6 order approving the parties’ Settlement Agreement pursuant to the Private Attorneys
7 General Act (PAGA); and

8 WHEREAS, Defendant LVMH Fragrance Brands US LLC (“Defendant”) did
9 not oppose the Ex Parte Application and appeared through counsel at the hearing; and

10 WHEREAS, the Court has reviewed the Ex Parte Application, all papers
11 submitted in support thereof, including the Declaration of Thomas D. Rutledge, Esq.
12 and the Settlement Agreement attached as Exhibit 1, as well as the record in this
13 matter.

14 NOW, THEREFORE, GOOD CAUSE APPEARING, THE COURT HEREBY
15 FINDS AND ORDERS AS FOLLOWS:

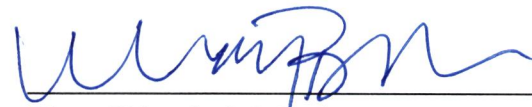
- 16 1. The Settlement Agreement was the product of arm’s-length negotiations and
17 was not the result of fraud, duress, or collusion;
- 18 2. Plaintiffs’ Counsel conducted sufficient investigation and discovery to
19 enable informed decision-making;
- 20 3. Plaintiffs’ Counsel is experienced in PAGA and employment-related
21 representative actions, and supports approval of the Settlement Agreement;
- 22 4. The claims in this case involved complex legal and factual issues, and the
23 parties faced uncertainty and potential delay from ongoing litigation or
24 appellate review;
- 25 5. The settlement amount is fair, reasonable, and adequate in light of the
26 claims asserted and the risks of continued litigation; and
- 27 6. The requested attorneys’ fees, costs, and litigation expenses are reasonable
28 and justified based on the results achieved and work performed

1 ACCORDINGLY, IT IS HEREBY ORDERED:

- 2 1. Plaintiffs' Ex Parte Application for Approval of the PAGA Settlement is
3 GRANTED;
- 4 2. The Settlement Agreement is APPROVED in its entirety;
- 5 3. The parties are directed to fully perform and comply with all terms of the
6 Settlement Agreement;
- 7 4. Judgment shall be entered in accordance with the terms of the Settlement
8 Agreement; and
- 9 5. This action shall be dismissed with prejudice within sixty (60) days of
10 the date of this Order.

11 **IT IS SO ORDERED.**

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13 Dated: 5/1/25



14 Hon. Wendy M. Behan
15 Judge of the Superior Court of California
16 County of San Diego
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