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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SACRAMENTO**

11 ROSE WATSON, as an aggrieved employee
pursuant to the Private Attorneys General Act
12 (“PAGA”), on behalf of the State of California
and other non-party Aggrieved Employees,

13 Plaintiff,

14 vs.
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16 PRESSED JUICERY, INC., a Delaware
corporation; and DOES 1 through 10, inclusive,

17 Defendants.
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Case No. 23CV011127

Assigned to the Hon. Jill H. Talley

RESERVATION NO. A-11127-003

**[PROPOSED] ORDER APPROVING THE
PARTIES’ PAGA SETTLEMENT
AGREEMENT AND JUDGMENT**

Date: September 6, 2024

Time: 9:00 a.m.

Place: Department 23

Complaint Filed: November 6, 2023

Trial Date: None Set

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1 concession, or liability whatsoever by or against Defendant.

2 6. The Court approves the gross settlement amount of \$700,000. After deducting the
3 approved amounts for attorneys' fees and costs, service award, and settlement administration costs, the
4 net settlement amount of \$432,014.66 will be allocated as follows: Seventy-Five Percent (75%), or
5 approximately \$324,011.00, shall be paid to the California Labor and Workforce Development Agency,
6 and the remaining Twenty-Five Percent (25%), or approximately \$108,003.66, shall be paid to
7 Aggrieved Employees.

8 7. The Court hereby awards \$233,333 in attorneys' fees and \$13,652.34 costs to Plaintiff's
9 Counsel, Capstone Law APC.

10 8. The Court approves a Service Award of \$10,000 to Rose Watson.

11 9. The Court appoints CPT Group, Inc. to serve as the Settlement Administrator, and
12 approves Settlement Administration Costs of \$11,000.

13 10. Plaintiffs shall file a declaration from the Settlement Administrator regarding the
14 completion of settlement administration activities no later than May 4, 2026, as well as an amended
15 judgment regarding the distribution of unclaimed residuals to The Justice Gap Fund maintained by The
16 State Bar of California.

17 11. This Judgment shall be binding on all Aggrieved Employees and the State of California,
18 who are hereby barred by the doctrine of res judicata from re-litigating the Settled Claims during the
19 Settlement Period, as those terms are defined by the Settlement. *See Arias v. Superior Court*, 46 Cal. 4th
20 969, 986 (2009) (holding that a judgment in a representative action brought by an aggrieved employee
21 under PAGA is binding not only on the named employee plaintiff but also on state labor law
22 enforcement agencies and any aggrieved employee not a party to the proceeding). Without affecting the
23 finality of the Order and Judgment, the Court shall retain exclusive and continuing jurisdiction under
24 California Code of Civil Procedure § 664.6, over the above-captioned action and the parties for purposes
25 of enforcing the terms of the Judgment and the Settlement.

26 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

27 Date _____

Hon. Jill H. Talley
Sacramento County Superior Court Judge