

Karen Gold (State Bar No. 258360)  
kgold@blackstonepc.com  
Sara Pezeshkpour (State Bar No. 260240)  
spezeshkpour@blackstonepc.com  
Noam Reiffman (State Bar No. 299446)  
nreiffman@blackstonepc.com  
Marissa Mayhood (State Bar No. 334376)  
mmayhood@blackstonepc.com  
**BLACKSTONE LAW, APC**  
8383 Wilshire Boulevard, Suite 745  
Beverly Hills, California 90211  
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff JESSE ROMERO, individually,  
on behalf of others similarly situated, and on behalf of  
Aggrieved Employees pursuant to the  
California Private Attorneys General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

JESSE ROMERO, individually and on behalf of  
others similarly situated,

Plaintiff,

vs.

CALIFORNIA CLOSET COMPANY, a  
California corporation; CAL CLOSET RETAIL,  
INC., a Delaware corporation; and DOES 1  
through 25, inclusive,

Defendants.

Case No.: 23STCV27355

*Hon. Samantha Jessner, Department 7*

**[REVISED PROPOSED] JUDGMENT**

Date: June 5, 2025  
Time: 10:00 a.m.  
Dept.: 7

Complaint Filed: November 7, 2023  
FAC Filed: October 10, 2024  
Trial Date: None Set

1           The Court, having entered a Final Approval Order in this Action, and good cause appearing,  
2   HEREBY ADJUDGES AND DECREES AS FOLLOWS:

3           1.       The Court, for purposes of this Judgment, refers to all terms and definitions as set forth  
4   in the Settlement.

5           2.       The Court hereby ORDERS, ADJUDGES, AND DECREES that Judgment in this  
6   matter is entered in accordance with the Court's Final Approval Order and the Parties' Settlement  
7   Agreement.

8           3.       The Parties shall bear their own respective attorneys' fees and costs, except as  
9   otherwise provided for in the Settlement and approved by the Court.

10          4.       This Judgment and the accompanying Final Approval Order are intended to be a final  
11   disposition of the Action in its entirety and are intended to be immediately appealable.

12          5.       Neither the Settlement, the Final Approval Order, or this Judgment are an admission  
13   by Defendants, or any of the other Released Parties, of a finding of the validity of any claims in the  
14   Action or of any wrongdoing by Defendants, or any of the other Released Parties. Neither the Final  
15   Approval Order, the Settlement, nor this Judgment may be construed as, or may be used as, an  
16   admission by or against Defendants, or any of the other Released Parties, of any fault or wrongdoing  
17   whatsoever. The entering into or carrying out of the Settlement, this Judgment, and any negotiations  
18   or proceedings related thereto, shall not in any event be construed as, or deemed to be evidence of, an  
19   admission or concession with regard to the denials or defenses by Defendants, or any of the other  
20   Released Parties, and shall not be offered in evidence in any action or proceeding in any court,  
21   administrative agency, or other tribunal for any purpose whatsoever other than to enforce the  
22   provisions of the Final Approval Order the Settlement, the Class Released Claims, the PAGA Released  
23   Claims, this Judgment, or any related agreement or release. Notwithstanding these restrictions, any of  
24   the Released Parties may file in the Action, or submit in any other proceeding, the Settlement, Final  
25   Approval Order, Judgment, and any other papers and records on file in the Action as evidence of the  
26   Settlement to support a defense of res judicata, collateral estoppel, release, or other theory of claim or  
27   issue preclusion or similar defense as to the Class Released Claims and PAGA Released Claims.  
28

1           6.       Notwithstanding the finality of this Judgment, pursuant to California Code of Civil  
2 Procedure section 664.6 and California Rule of Court 3.769(h), the Court shall have continuing  
3 jurisdiction over the terms and conditions of the Settlement until all payments and obligations  
4 contemplated by the Settlement have been fully carried out.

5  
6 **IT IS SO ORDERED.**

7 Dated: \_\_\_\_\_

\_\_\_\_\_ Honorable Samantha Jessner