

1 Adam Rose (210880)  
[adam@starrlaw.com](mailto:adam@starrlaw.com)  
2 Manny Starr (319779)  
[manny@frontierlawcenter.com](mailto:manny@frontierlawcenter.com)  
3 FRONTIER LAW CENTER  
23901 Calabasas Road, #1084  
4 Calabasas, CA 91302  
Telephone: (818) 225-9040  
5 Facsimile: (818) 225-9042

6 Janelle Carney (201570)  
[janelle@janellecarneylaw.com](mailto:janelle@janellecarneylaw.com)  
7 JANELLE CARNEY – ATTORNEY AT LAW  
14758 Pipeline Ave., Suite E  
8 Chino Hills, CA 91709

9 Attorneys for Plaintiff  
David Llamas

10 **SUPERIOR COURT OF CALIFORNIA**  
11 **COUNTY OF SAN DIEGO**  
12

13 DAVID LLAMAS, individually and on behalf of  
14 all others similarly situated,

15 Plaintiff,

16 vs.

17 SAN DIEGO SUNRISE MANAGEMENT  
18 COMPANY, INC., and DOES 1 to 100,

19 Defendants.  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 37-2023-00044344-CU-OE-CTL

**STIPULATION FOR COURT  
APPROVAL OF PAGA SETTLEMENT  
WITHOUT A HEARING**

Action filed: October 12, 2023

1 WHEREAS, Plaintiff David Llamas filed his Complaint on October 12, 2023;

2 WHEREAS, Defendant filed a Motion to Compel Arbitration.

3 WHEREAS, Plaintiff's individual claims were ordered to arbitration and the class claims  
4 were dismissed.

5 WHEREAS, the parties attended mediation on June 20, 2025, and have reached a  
6 settlement, subject to court approval;

7 WHEREAS, the Plaintiff seeks approval of a PAGA settlement in the gross amount of  
8 \$140,000.00, on behalf of the State of California and the Aggrieved Employees who are or were  
9 employed by Defendant San Diego Sunrise Management Company. The Aggrieved Employees are  
10 defined in the context of the Parties' settlement agreement only as follows: All current and former  
11 non-exempt employees who have worked for Defendant in California as an hourly employee  
12 during the period of October 12, 2022, through approval of the settlement by the Superior Court, or  
13 August 31, 2025, whichever occurs first;

14 WHEREAS, in light of *Turrieta v. Lyft, Inc.*, 16 Cal. 5th 664 (2024), and the fact that Labor  
15 Code § 2699(s)(2) as well as Labor Code § 2699.3(b)(4) permit courts to approve any settlement of  
16 any action filed under PAGA without a noticed motion;

17 WHEREAS, Labor Code § 2699(s)(2) requires the Superior Court to review and approve  
18 any settlement of any action filed under PAGA, it does not specify how the Court must accept the  
19 settlement to be reviewed. Where the course of proceedings is not specifically pointed out by the  
20 Code of Civil Procedure or the underlying statute, any suitable process or mode of proceeding may  
21 be adopted by the Court which may appear most conformable to the spirit of the Code. (*See* CCP §  
22 187);

23 WHEREAS, the Motion for Court Approval of PAGA Settlement, Declaration of Janelle  
24 Carney, Declaration of Adam Rose, Declaration of David Llamas, and the Proposed Order, detail  
25 the facts and demonstrate the reasonableness of the settlement;

26 /////

27 /////

28 /////

29 /////

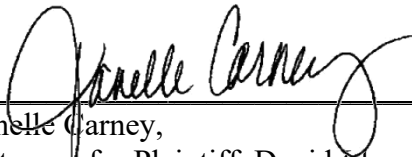
1           **NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:**

- 2           1.       The Parties request that the Court approve the Parties' PAGA settlement as provided  
3                   in the Declaration of Janelle Carney, **Exhibit 1**, filed on September 9, 2025, without  
4                   a hearing on the motion.
- 5           2.       Court enter the Proposed Order lodged concurrently herewith approving the  
6                   settlement.

7   Date: September 9, 2025

JANELLE CARNEY – ATTORNEY AT LAW, APC  
FRONTIER LAW CENTER

9  
10           By:

  
\_\_\_\_\_  
Janelle Carney,  
Attorney for Plaintiff, David Llamas

12   Dated: September 9, 2025

O'HAGEN MEYER

14  
15           By:

S/ David Nusz

\_\_\_\_\_  
David Nusz  
Attorneys for Defendant  
San Diego Sunrise Management Company

## PROOF OF SERVICE

### STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On September 9, 2025, I served the foregoing document described as:

### STIPULATION FOR COURT APPROVAL OF PAGA SETTLEMENT WITHOUT A HEARING

on INTERESTED PARTIES in this action as stated below:

David Nusz  
O'HAGAN MEYER  
4695 MacArthur Ct., Ste 900  
Newport Beach, CA 92660  
[dnusz@ohaganmeyer.com](mailto:dnusz@ohaganmeyer.com)  
[slopez@ohaganmeyer.com](mailto:slopez@ohaganmeyer.com)

Manny Starr, Esq.  
[manny@frontierlawcenter.com](mailto:manny@frontierlawcenter.com)  
Adam Rose  
[adam@frontierlawcenter.com](mailto:adam@frontierlawcenter.com)  
[eservice@frontierlawcenter.com](mailto:eservice@frontierlawcenter.com)  
FRONTIER LAW CENTER  
6200 Canoga Ave., Suite 470  
Woodland Hills, CA 91367

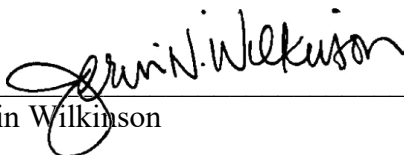
Matthew Sullivan  
O'HAGAN MEYER  
3200 Park Center Dr., Suite 700  
Costa Mesa, CA 92626  
[msullivan@ohaganmeyer.com](mailto:msullivan@ohaganmeyer.com)

**XX BY E-MAIL**: I electronically served the above-mentioned document to each of the above recipients at their respective e-mail addresses. My e-address is: [Jerin@JanelleCarneyLaw.com](mailto:Jerin@JanelleCarneyLaw.com)

California Labor & Workforce Development Agency  
Via Online Filing  
<http://www.dir.ca.gov/private-attorneys-general-act/private-attorneys-general-act.html>

Executed on September 9, 2025, at Chino Hills, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

  
\_\_\_\_\_  
Jerin Wilkinson