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on behalf of herself and on behalf of all other
aggrieved employees

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

JUN 05 2026

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE**

SARA STEELE-RAMIREZ, on behalf of
herself and on behalf of all other aggrieved
employees,

Plaintiff,

vs.

PROJECT PARTNERS INC., a California
corporation; PRIDESTAFF dba
PRIDESTAFF, INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 30-2023-01361715-CU-OE-CXC

Hon. William Claster

**REVISED ~~[PROPOSED]~~ ORDER
APPROVING THE PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AND RELEASE UNDER
CALIFORNIA LABOR CODE §§ 2698 *et*
*seq.***

*[filed concurrently with Notice of Motion and
Motion to Approve Settlement; Declaration of
Emma Geesaman; Declaration of Roman
Shkodnik; [Proposed] Judgment]*

Date: May 29, 2026
Time: 9:00 a.m.
Dept.: CX101

1 Having considered Plaintiff's submission, documents submitted in support thereof,
2 Defendants' non-opposition to Plaintiff's Motion and good cause appearing, **IT IS HEREBY**
3 **ORDERED** that Plaintiff's Motion to Approve the Private Attorneys General Act Settlement and
4 Release is **GRANTED**, as follows:

5 a) All terms used herein shall have the same meaning as defined in the Private Attorney
6 General Act ("PAGA") Settlement Agreement ("Settlement Agreement" or "Settlement").

7 b) The Court of Appeal *Moniz v. Adecco*, 72 Cal.App.5th 56, 77, held that it must
8 "determine independently whether a PAGA settlement is fair and reasonable," to protect "the
9 interests of the public and the LWDA in the enforcement of state labor laws." Here, the Court
10 hereby approves the terms set forth in the Settlement Agreement and finds that the Settlement is,
11 in all respects, fair, adequate, reasonable, and just and is not arbitrary, oppressive or confiscatory
12 and directs the Parties to effectuate the Settlement according to its terms. The Court finds that the
13 Settlement has been reached as a result of informed and non-collusive arm's-length negotiations.
14 The Court further finds that the Parties have conducted extensive investigation and research, and
15 their attorneys were able to reasonably evaluate their respective positions. The Court also finds
16 that settlement now will avoid additional and potentially substantial litigation costs, as well as
17 delay and risks if the Parties were to continue to litigate the case. The Court has reviewed the
18 monetary recovery being provided as part of the Settlement and recognizes the significant value
19 accorded to Plaintiff and each Aggrieved Employee.

20 c) The Settlement is not an admission by Defendants Project Partners Inc. and PrideStaff
21 dba PrideStaff, Inc. ("Defendants") or Released Parties as defined below, nor is this Order a
22 finding of the validity of any allegations or of any wrongdoing by Defendants or Released Parties.
23 Neither this Order, the Settlement, nor any document referred to herein, nor any action taken to
24 carry out the Settlement, may be construed as, or may be used as, an admission of any fault,
25 wrongdoing, omission, concession, or liability whatsoever by or against Defendants or Released
26 Parties.

27 d) Defendants shall pay Aggrieved Employees, PAGA Counsel, Settlement Administrator
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1 and LWDA pursuant to the terms of the Settlement.

2 e) The Court hereby confirms Roman Shkodnik and Emma Geesaman of D.Law, Inc. as
3 PAGA Counsel.

4 f) The Court finds that attorneys' fees of thirty percent (30%) of the total settlement
5 amount of \$118,650 which is Thirty-Five Thousand Five Hundred and Ninety Five Dollars and
6 Zero Cents (\$35,595.00) is reasonable and the costs requested of Seventeen Thousand Nine
7 Hundred and Eleven Dollars and Zero Cents (\$17,911.00) as reasonable and necessary for the
8 prosecution of this action. The Court hereby awards attorneys' fees in the amount of \$35,595.00
9 and costs in the amount of \$17,911.00 to PAGA Counsel.

10 g) The Court finds that the Administration costs of \$4,000.00 is reasonable and the Court
11 hereby awards administrator costs in the amount of \$4,000.00 to Phoenix Settlement
12 Administrators.

13 h) The LWDA's 75% share of the net settlement amount of \$61,144.00 is \$45,858.00, and
14 the balance of \$15,286 shall be paid to the Aggrieved Employees pursuant to the terms of the
15 Settlement.

16 i) The Court further orders, adjudges and decrees that upon the Effective Date, the
17 Aggrieved Employees and PAGA Counsel, fully release and forever discharge Project Partners,
18 Inc. and PrideStaff dba PrideStaff, Inc. ("Defendants"), ^{pursuant to the terms of} ~~and all of their respective present~~
^{the settlement.}
19 and former parents, owners, subsidiaries, divisions, affiliated or related persons or entities, and
20 each of their respective principals, owners, officers, directors, employees, partners, shareholders,
21 attorneys, insurers, representatives, and agents ("Released Parties") from all claims for civil
22 penalties under PAGA that were alleged or reasonably could have been alleged, based on the
23 facts alleged in the Operative Complaint and the PAGA Notice, including claims for civil
24 penalties under PAGA for or related to alleged violations of Labor Code §§ 201, 202, 203, 204,
25 210, 226, 226.3, 226.7, 510, 512, 558, 558.1, 1174, 1174.5, 1182.12, 1185, 1194, 1194.2, 1197,
26 1198, 1198.5, 1199, 2698, 2699 *et seq.*, and, 2802. ("Released Claims").

27 j) Pursuant to California Code of Civil Procedures section 664.6 the Court shall have and
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1 retain continuing jurisdiction over this action and the Parties including after the entry of this
2 Order, to the fullest extent necessary to interpret, enforce and effectuate the terms and intent of
3 the Settlement and this Order.

4 k) The Settlement Administrator is to file a declaration no later than April 23, 2027 to
5 confirm that the distribution of funds to Aggrieved Employees is complete.

6 **IT IS SO ORDERED.**

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8 Dated: 6-5-26

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10 Hon. William Claster
11 Judge of the Superior Court
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