

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
GILBERT CASTELLON, an individual, on behalf of all similarly situated aggrieved employees
2. Title of the proposed order:
PROPOSED] ORDER AND JUDGMENT
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Motion for Approval of Settlement of Private Attorneys General Act of 2004 ("PAGA") Claims
 - b. Date and time: May 11, 2026 @1:30 p.m.
 - c. Place: Orange County Superior Court, 751 W. Santa Ana Blvd., Santa Ana, CA 92701
4. The proposed order was served on the other parties in the case.

/s/ John J. Weber
(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME:
Castellon v. Priority Plus

CASE NUMBER:
30-2024-01375043-CU-OE-CXC

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):
5820 Oberlin Drive, Suite 205, San Diego, CA 92121

b. My electronic service address is (*specify*): yadi@keeganbaker.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
Todd R. Wulffson, Esq., Nancy "Niki" N. Lubrano, Esq.
Attorneys for Defendant PRIORITY PLUS FINANCIAL, LLC

b. To (*electronic service address of person served*): twulffson@cdflaborlaw.com; nlubrano@cdflaborlaw.com

c. On (*date*): April 27, 2026

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

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

Date: April 27, 2026

Yadira Samaniego

(TYPE OR PRINT NAME OF DECLARANT)

 /s/ Yadira Samaniego

(SIGNATURE OF DECLARANT)

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

10 GILBERT CASTELLON, an individual, on
11 behalf of all similarly situated aggrieved
12 employees,

13 Plaintiff,

14 v.

15 PRIORITY PLUS FINANCIAL, LLC., a
16 California limited liability company; and
17 DOES 1-50, inclusive,

18 Defendants.
19

Case No.: 30-2024-01375043-CU-OE-CXC

[PROPOSED] ORDER AND JUDGMENT

Date: May 11, 2026

Time: 1:30 P.M.

Judge: Hon. David A. Hoffer

Dept.: CX-103

Complaint Filed: January 22, 2024

20 Plaintiff Gilbert Castellon's ("Plaintiffs") Motion for Order (1) granting approval of the
21 proposed settlement of claims brought pursuant to the Private Attorneys General Act of 2004 (Cal.
22 Labor Code § 2698 *et seq.*) ("PAGA") set forth in the Parties' Settlement Agreement and Release
23 of Private Attorneys General Act Claim (the "Settlement" or "Settlement Agreement"); (2)
24 appointing Simpluris, Inc., ("Simpluris") as the Settlement Administrator and approving payment
25 of its fees not to exceed \$2,750 from the Gross Settlement Amount; (3) directing disbursement of
26 the Gross Settlement Amount pursuant to the terms of the Settlement Agreement; (4) directing
27 payment of attorneys' fees of \$95,700 and litigation costs of \$6,693.05 from the Gross Settlement
28 Amount to Counsel for Plaintiff; (5) directing an enhancement payment from the Gross Settlement

1 Amount in the amount of \$5,000 to Plaintiff; and (6) dismissing this Action with prejudice, came
2 on for hearing before this Court in Department CX-103, the Honorable David A. Hoffer presiding,
3 on May 11, 2026. Appearances were noted on the record.

4 Having reviewed the Settlement Agreement and duly considered the Parties' papers and oral
5 argument, and good cause appearing,

6 **THE COURT HEREBY ORDERS AS FOLLOWS:**

7 1. All terms used herein shall have the same meaning as defined in the Settlement
8 Agreement, which is attached to the Declaration of John J. Weber as Exhibit D.

9 2. This Court has jurisdiction over the claims of the PAGA Members and the State of
10 California asserted in this proceeding and over all parties to the Action.

11 3. The Court finds that the Settlement was entered into in good faith, that the
12 Settlement is fair, reasonable and adequate, and that the Settlement satisfies the standards and
13 applicable requirements for approval of PAGA representative actions under California law. The
14 Court finds that the Gross Settlement Amount of \$319,000 represents a fair compromise of the
15 claims alleged in the Action, considering the maximum potential value of the claims asserted and
16 the risks inherent in further litigation.

17 4. The Court has considered the authorities and evidence presented by Plaintiff and
18 based thereon hereby approves the following awards and deductions from the Gross Settlement
19 Amount:

20 a. To Plaintiff's Counsel, Keegan & Baker, LLP, an award of \$95,700.00 in
21 attorneys' fees and \$6,693.05 in reimbursement of litigation costs. The Court finds that
22 these amounts are fair and reasonable and commensurate with applicable California law.

23 b. To Plaintiff Gilbert Castellon, an enhancement payment of \$5,000. The
24 Court finds that both the time and effort that Plaintiff spent on behalf of other PAGA
25 Members and the State justifies this payment.

26 c. To Simpluris, Inc., the settlement administrator, a payment of up to \$2,750
27 to administer the Settlement through its conclusion, including disbursement of the Gross
28 Settlement Amount and all tax reporting associated therewith.

1 5. The amount remaining of the Gross Settlement Amount following these deductions
2 is the PAGA Penalty Fund of \$208,856.95. The PAGA Penalty Fund shall be distributed 75% (or
3 \$156,642.71) to the Labor and Workforce Development Agency and 25% (or \$52,214.24) to the
4 PAGA Members.

5 6. The Court finds that the Settlement has been provided to the LWDA as required by
6 PAGA and Labor Code section 2699, subdivision (l)(2), in particular.

7 7. Upon entry of this Order, the Parties shall effectuate all terms of the Settlement
8 based on the provisions and timelines set forth in the Settlement Agreement.

9 8. The Court retains continuing jurisdiction over the Parties and this action to
10 adjudicate any matters related to this Order and Judgment pursuant to Code of Civil Procedure §
11 664.6 and as otherwise allowed by law.

12 9. A Final Report Hearing is set for February 15, 2027, at 1:30 p.m. in Department
13 CX-103. All supporting papers must be filed at least 16 days before the Final Report Hearing
14 date.

15 10. Plaintiff to give notice of this Order and Judgment to the LWDA and Defendant.

16 11. This Action is DISMISSED WITH PREJUDICE.

17 **IT IS SO ORDERED.**

18 Dated:

19 _____
20 Hon. David. A. Hoffer
21 JUDGE OF THE SUPERIOR COURT
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