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Patricia Lim

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA

PATRICIA LIM, on behalf of herself and in
her representative capacity on behalf of the
State of California, and all other aggrieved
employees,

Plaintiff,

v.

WACHHORST LEIGH MEINSTER, a
California corporation, PETER CHANG
KONO, an individual, SHACHI BAHL, an
individual, MARTHA VANZINA, an
individual, ROBERT IVERSON, an individual,
and DOES 1-15

Defendants.

Case No: 24CV429909

**[PROPOSED] JUDGMENT APPROVING
PAGA SETTLEMENT**

[Complaint Filed: January 26, 2024]

Hearing Date: April 3, 2025

Time: 9:00 a.m.

Dept: 06

Hon. Evette D. Pennypacker

The Motion of Plaintiff Patricia Lim for an order approving the PAGA settlement of the
above-captioned action and entering judgment thereon ("Motion") having come before the Court
for a hearing on April 3, 2025, and the Court being duly apprised of the premises, and good cause
appearing, therefore,

IT IS HEREBY ORDERED, AJUDICATED, and DECREED THAT:

1. The Motion is granted, and the settlement of this action is hereby APPROVED.

1 2. Capitalized terms in this Approval Order shall have the same meaning they are given
2 in the PAGA Settlement Agreement and Release attached as Exhibit C to the Declaration of Harris
3 Emran filed in support of the Motion;

4 3. Apex Class Action Settlement Administrators is approved to serve as the Settlement
5 Administrator and is hereby authorized to perform all of the duties assigned to it in the Settlement
6 Agreement and to disburse the following from the Gross Settlement Amount in accordance with the
7 terms of the PAGA Settlement and Release:

- 8 a. Plaintiff's Individual Settlement Payment in the amount of \$45,000.00 of which,
9 \$15,750.00 will be allocated to Plaintiff's Counsel and \$29,250.00 to Plaintiff
10 for release of her individual claims;
- 11 b. Plaintiff's Enhancement Payment in recognition of Plaintiff's work on behalf of
12 the State of California and the Aggrieved Employees in the amount of \$3,000.00;
- 13 c. Attorneys' fees and costs to Plaintiff's Counsel for prosecution of the PAGA
14 Claim in the amount of \$39,600.00 for attorneys' fees and up to \$12,483.36, for
15 the costs incurred in this matter;
- 16 d. Settlement Administration Costs in the amount of \$2,980.00;
- 17 e. The remaining Net Settlement Amount, estimated to be Sixteen Thousand Nine
18 Hundred Thirty Six Dollars and Sixty Four Cents (\$16,936.64), as payment to
19 the LWDA and the Aggrieved Employees with seventy-five percent (75%),
20 estimated to be Twelve Thousand Seven Hundred Two Dollars and Forty Eight
21 Cents (\$12,702.48) of the Net Settlement Amount shall be distributed to the
22 LWDA ("LWDA Payment") and the remaining twenty-five percent (25%),
23 estimated to be Four Thousand Two Hundred Thirty Four Dollars and Sixteen
24 Cents (\$4,234.16) shall be distributed to the PAGA Settlement Members
25 ("PAGA Settlement Member Payment").

26 4. The State of California and all PAGA Group Members (including Plaintiff) are
27 hereby deemed to have, and by operation of this Approval Order and Judgment shall have, expressly
28 released, waived, and discharged Defendants and each and all of the Released Parties from the

1 PAGA Claims, including, demands, liabilities, damages, attorneys' fees, costs and penalties that
2 could have been recovered and they shall be bound by this Approval Order and Judgment and be
3 forever barred from suing the Released Parties on any of the PAGA Claims;

4 5. Judgment shall be entered forthwith in accordance with the foregoing, with each side
5 to pay his or its own attorneys' fees and costs except as expressly set forth in the Settlement
6 Agreement;

7 6. Plaintiff shall give notice of this Judgment to the Labor and Workforce Development
8 Agency within ten (10) days after entry of the Judgment or order pursuant to California Labor Code
9 section 2699(1)(3); and

10 7. The Court retains exclusive and continuing jurisdiction over this Action for purposes
11 of supervising, administering, implementing, interpreting, and enforcing this Order and Judgment,
12 as well as the Settlement.

13
14 **LET JUDGMENT BE FORTHWITH ENTERED ACCORDINGLY. IT IS SO**
15 **ORDERED.**

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17 Dated:

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19 _____
20 HONORABLE EVETTE D. PENNYPACKER
21 JUDGE OF THE SUPERIOR COURT
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