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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

NATALIA TAN, as an individual and on behalf of all others similarly situated, and as a private attorney general,

Plaintiff,

vs.

ASURION INSURANCE SERVICES, INC., a Tennessee corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 24CV000032

[Hon. Jill H. Talley, Department 8A]

[PROPOSED] ORDER GRANTING MOTION FOR APPROVAL OF PAGA SETTLEMENT AND FINAL JUDGMENT

Date:	November 20, 2026
Time:	9:00 a.m.
Department:	8A
Complaint Filed:	January 2, 2024

The motion for an Order Granting Approval of PAGA Settlement was filed by Plaintiff, Natalia Tan, on October 23, 2026, and a hearing was held before this Court on November 20, 2026.

After considering the papers and evidence, arguments of counsel, and all other matters presented to the Court, and having taken the matter under submission, **IT IS HEREBY ORDERED AND ADJUDGED** as follows:

1. The motion for approval of the Labor Code Private Attorneys General Act of 2004 ("PAGA") settlement is granted. Plaintiff has fairly and adequately protected the interests of the State, and Plaintiff's Counsel are qualified to serve as counsel for the Plaintiff in her individual and representative capacity. The Joint Stipulation of PAGA Settlement (the "Agreement") submitted by the Parties appears to be fair, adequate, and reasonable in light of PAGA's policies and in furtherance of PAGA's purposes.

2. The Parties are hereby ordered to carry out the terms of the Agreement.

3. Within seven days, Defendant, Asurion Insurance Services, Inc., is hereby ordered to deposit the $575,000.00 Settlement Amount with Phoenix Settlement Administrators (the "Administrator").

4. Within seven days after receipt of the Settlement Amount, the Administrator shall distribute the Settlement Amount as follows:

- $191,666.67 as Attorneys' Fees to Plaintiff's Counsel;
- $9,682.17 as Costs to Plaintiff's Counsel;
- $10,000.00 as a General Release Payment to Plaintiff;
- $9,000.00 as Administration Costs to the Administrator;
- $265,988.37 as PAGA Penalties to the Labor and Workforce Development Agency; and
- $88,662.79 as PAGA Penalties to PAGA Settlement Members based on the number of relevant pay periods worked by each PAGA Settlement Member.

5. The Court grants approval of the settlement in accordance with the terms of the Agreement and this Order.

6. A compliance hearing is set for **August 27, 2027**, at 9:00 a.m. in Department 8A of this Court. At least 15 days prior to the compliance hearing, Plaintiff shall file a declaration from the Administrator establishing the status of distribution of settlement funds.

7. The Court hereby enters Final Judgment. Without affecting the finality of the Order and Final Judgment filed herewith, the Court reserves continuing jurisdiction over the Action, Plaintiff, and Defendant for the purposes of (i) the interpretation and enforcement of the terms of the settlement, (ii) settlement administration matters, and (iii) post-Judgment matters as may be appropriate under Court rules or as set forth in the Agreement.

8. Except as otherwise provided in the Agreement, the Parties are to bear their own costs and attorneys' fees.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

DATED: _____, 2026

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HON. JILL H. TALLEY