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Attorneys for Plaintiff KARINA HUIZAR RODRIGUEZ,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

KARINA HUIZAR RODRIGUEZ, as an
individual and on behalf of all employees
similarly situated,

Plaintiff,

v.

TFC MANUFACTURING INC., a California
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV02351

[Assigned to Hon. Elihu M. Berle, Dept.6]

**[PROPOSED] JUDGMENT FOLLOWING
ORDER GRANTING FINAL APPROVAL
OF CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Date: July 1, 2025
Time: 9 a.m.
Courtroom: Dept. 6
Judge: Hon. Elihu M. Berle

Action Filed: January 30, 2024
Trial Date: Not Set

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 Plaintiff KARINA HUIZAR RODRIGUEZ (“Plaintiff”) and Defendant TFC
3 MANUFACTURING INC. (“Defendant”) reached terms of settlement for a putative class and PAGA
4 representative action. On or about July 1, 2025, the Court issued an Order granting Plaintiff’s motion for
5 final approval of a proposed class and PAGA representative action settlement of the claims asserted
6 against Defendant in this action (“Final Approval Order”). The settlement is memorialized in the
7 CLASS ACTION AND PAGA REPRESENTATIVE ACTION SETTLEMENT AGREEMENT (*see*
8 Declaration of Lilit Tunyan In Support of Plaintiff’s Motion for Final Approval of Class and PAGA
9 Representative Action Settlement [Tunyan Decl.], at Exh. 1) which is referred to herein as the
10 “Settlement” or “Settlement Agreement”.

11 The Court’s Final Approval Order is incorporated herein in its entirety. The Court now enters
12 Judgment following the entry of the Final Approval Order. The Judgment set forth herein is intended to
13 be a final disposition of the Action in its entirety and is intended to be immediately appealable.

14 **JUDGMENT**

15 In accordance with and for the reasons stated in the Final Approval Order, Judgment shall be
16 entered whereby the Plaintiff, all Settlement Class Members, and all PAGA Employees shall take
17 nothing from Defendant, except as expressly set forth in the Final Approval Order and the Settlement.

18 The Class Members are:

19 All persons who worked for Defendant in California as an hourly paid, non-exempt
20 employee and who did not sign individual settlement and release agreements with
21 Defendant during the Class Period (the “Class Period” is January 30, 2020 through
October 25, 2024.)

22 There were no objections and requests for exclusion submitted by Class Members.

23 The Court also defines the following “PAGA Employees” impacted by the proposed settlement
24 of PAGA claims:

25 All persons who worked for Defendant in California as an hourly paid, non-exempt
26 employee and did not sign individual settlement and release agreements with Defendant
27 during the PAGA Period. (the “PAGA Period” is January 30, 2023 through October
25, 2024.)

28 Class and PAGA Representative Action claims are released, pursuant to the terms of the

Settlement, as follows:

Effective on the date when Defendant fully funds the entire Gross Settlement Amount and fund all employer payroll taxes owed on the Wage Portion of the Individual Class Payments, Plaintiff, Class Members who have not submitted a valid and timely Request for Exclusion as to claims other than the PAGA claim, and Class Counsel will release claims against all Released Parties as follows:

Release by Participating Class Members Who Are Not Aggrieved Employees: All Participating Class Members, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, release Released Parties from all claims that were alleged, or reasonably could have been alleged, based on the Class Period facts stated in the Operative Complaint. Except as set forth in Section 5.3 of this Agreement, Participating Class Members do not release any other claims, including claims for vested benefits, wrongful termination, violation of the Fair Employment and Housing Act, unemployment insurance, disability, social security, workers' compensation, or claims based on facts occurring outside the Class Period.

Release by Non-Participating Class Members Who Are Aggrieved Employees: All Non-Participating Class Members who are Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, the Released Parties from all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA Period facts stated in the Operative Complaint and the PAGA Notice letter.

"Released Parties" means: Defendant and each of its former and present directors, officers, shareholders, owners, agents, employees, attorneys, insurers, predecessors, successors, assigns.

Distributions pursuant to the Settlement shall issue in the amounts authorized in the Final Approval Order, according to the deadlines specified in the Settlement.

Pursuant to California Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of Court, this Court reserves exclusive and continuing jurisdiction over this action, the Plaintiff, Settlement Class Members, and Defendant, for the purposes of:

- (a) supervising the implementation, enforcement, construction, and interpretation of the Settlement, the Preliminary Approval Order, the plan of allocation, the Final Approval Order, and the Judgment; and
- (b) supervising distribution of amounts paid under this Settlement.

IT IS SO ORDERED.

Dated: _____

Hon. Elihu M. Berle
LOS ANGELES COUNTY SUPERIOR COURT JUDGE

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
Los Angeles, California 90071.

7 On the date indicated below, I served the document described as: **[PROPOSED] JUDGMENT**
8 **FOLLOWING ORDER GRANTING FINAL APPROVAL OF CLASS AND PAGA**
9 **REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this action by sending a
true copy thereof to interested parties as follows and as stated on the attached service list:

10 Laurie M. Cortez
11 lauriecortez@emiliolaw.com
12 info@emiliolaw.com
13 Rachel Thomas
14 rachelthomas@emiliolaw.com
15 **EMILIO LAW GROUP, APC**
12832 Valley View Street, Suite 106
Garden Grove, California 92845
Tel: 714-379-6239
Fax: 714-379-5444

16 ***Attorneys for Defendant TFC MANUFACTURING INC.***

17 [✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties
18 to accept electronic service, I caused the documents to be sent to the persons at the
19 electronic service addresses listed above via third-party cloud service
CASEANYWHERE. I did not receive an error message.

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

22 Executed on April 14, 2025 at Glendale, California.

23 KAREN ARELLANO

24 Name

25 _____
26 Signature