

05/12/2026

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ULYSSES NAJARRO, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

FRONTIER COMMUNICATIONS OF
AMERICA; ADEX CORPORATION; and DOES
1 through 10, inclusive,

Defendants.

Case No.: 24STCV01967

*[Assigned to Hon. David S. Cunningham III,
Dept. 11]*

~~[PROPOSED]~~ JUDGMENT

*[Filed with Notice of Motion and Motion for
Approval of PAGA Settlement, the Declaration
of Kane Moon, and [Proposed] Order]*

PAGA APPROVAL HEARING:

Date: May 12, 2026

Time: 11:00am

Dept.: 11

Action Filed: January 24, 2024

FAC Filed: April 5, 2024

Trial Date:

1 **PROPOSED JUDGMENT**

2 Plaintiff Ulysses Najarro (“Plaintiff”) and Frontier Communications of America (“Frontier”),
3 ADEX Telecom, and ADEX Corporation (ADEX Telecom and ADEX Corporation are collectively,
4 “ADEX”) (Frontier and ADEX are collectively, “Defendants”) (Defendants and Plaintiff are
5 collectively referred to as the “Parties”) have reached a settlement of the above-captioned matter
6 (the “Action”) alleging a cause of action under the Private Attorneys General Act of 2004, Labor
7 Code sections 2698, *et seq.* (“PAGA”).

8 Pursuant to PAGA, Plaintiff filed a Motion for Approval of PAGA Settlement (“PAGA
9 Approval Motion”), seeking approval of the Parties’ PAGA Settlement Agreement (“Settlement”),
10 a copy of which is attached as “Exhibit A” to the Declaration of Kane Moon in Support of
11 Plaintiff’s Motion for Approval of PAGA Settlement.

12 The Court, having duly considered Plaintiff’s Notice of Motion and Motion for Approval
13 of the PAGA Settlement (“PAGA Approval Motion”), the supporting declarations and exhibits
14 thereto, all papers filed, and proceedings had herein, and having reviewed the record in this Action,
15 and good cause appearing, has entered an Order granting approval of the Settlement (“Approval
16 Order”).

17 The Court, having entered the Approval Order, and good cause appearing, **HEREBY**
18 **ADJUDGES AND DECREES AS FOLLOWS:**

- 19 1. The Approval Order is incorporated herein in its entirety.
- 20 2. The Court, for purposes of this Judgment, refers to and incorporates all defined terms
21 and provisions as set forth in the Settlement, which is attached as “Exhibit 1” to the Approval Order.
- 22 3. In accordance with and for the reasons stated in the Approval Order, Judgment is
23 entered whereby Plaintiff, the California Labor and Workforce Development Agency (the “LWDA”),
24 and the Aggrieved Employees shall take nothing from Defendants, except as expressly set forth in
25 the Settlement.

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1 4. The obligations set forth in the Settlement are deemed part of this Judgment, and the
2 Parties and Administrator are ordered to carry out the Settlement according to its terms and
3 provisions and the Approval Order.

4 5. **Release of Claims.** Effective on the date when Defendants fully fund the entire
5 Gross Settlement Amount Plaintiff and PAGA Counsel will release claims against all Released
6 Parties as follows:

7 a. Released Parties: ADEX Corporation and ADEX Telecom and all joint
8 employers and staffing companies, including but not limited to, ADEX Corp,
9 Inc., Frontier California Inc., Citizens Telecom Services Company LLC,
10 Frontier Communications Parent, Inc., Frontier Communications of America,
11 Inc., CEOHR, Inc., High Wire Networks Inc., and the respective officers,
12 directors, shareholders, members, agents, assigns, attorneys, insurers,
13 independent contractors, employees, predecessors, successors, parents,
14 subsidiaries, affiliated, related entities or other representatives of any kind of
15 each of the foregoing entities, and related parties that have been or could have
16 been asserted in the Operative Complaint in the Action.

17 b. Release by Aggrieved Employees: Aggrieved Employees release, on behalf of
18 themselves and their respective former and present representatives, agents,
19 attorneys, heirs, administrators, successors, and assigns, the Released Parties
20 from all claims, liabilities, and causes of action for PAGA penalties arising out
21 of or relating to the employment of Plaintiff or the Aggrieved Employees
22 during the PAGA Period that were alleged in the Operative Complaint and/or
23 the January 21, 2024 PAGA Notice, February 22, 2024 PAGA Notice and April
24 4, 2025 PAGA Notice submitted to the LWDA (collectively PAGA Notice as
25 defined in the Settlement) or sthat reasonably could have been alleged based
26 on the PAGA Period facts stated in the Operative Complaint and/or in the
27 PAGA Notice, including all PAGA claims seeking civil penalties premised
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1 upon the alleged failure to: pay all wages (including minimum wage and
2 overtime wages), provide compliant meal breaks, provide compliant rest
3 breaks, indemnify necessary business expenses, timely pay wages during
4 employment, timely furnish accurate itemized wage statements, to pay wages
5 twice per month, maintain accurate records, and pay all wages including
6 accrued vacation due at separation from employment (“Released Claims”).

7 6. This Judgment is intended to be a final disposition of the Action in its entirety.
8 The Parties shall bear their own respective attorneys’ fees and costs, except as otherwise provided
9 for in the Settlement and the Approval Order. Defendants and the Released Parties shall have no
10 further liability for costs, expenses, interests, attorneys’ fees, or for any other charge, expense, or
11 liability relating to the released claims and shall be released from all claims as set forth in the
12 Settlement, the Approval Order, and this Judgment.

13 7. Pursuant to California Code of Civil Procedure section 664, and without affecting the
14 finality of the Approval Order and this Judgment, this Court shall retain jurisdiction over the Parties,
15 Action, and the Settlement solely for purposes of (i) enforcing the Settlement and/or this Judgment,
16 (ii) addressing settlement administration matters, and (iii) addressing such post-Judgment matters as
17 are permitted by law.

18 **IT IS SO ADJUDGED.**

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20 DATED: 05/12/2026

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22 Hon. David S. Cunningham
23 Judge of the Los Angeles County Superior Court
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25 Hon. Bruce G. Iwasaki
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