

5/30/2025 2:38:04 PM



LARS KINDEM (SBN 312835)
THE DION-KINDEM LAW FIRM
PETER R. DION-KINDEM, P. C.

3856 Davids Road, Agoura Hills, CA 91301
Telephone: (818) 883-4900
Email: kale@dionkindemlaw.com

Clerk of the Superior Court
By M. Guyot, Deputy Clerk

LONNIE C. BLANCHARD III (SBN 93530)
THE BLANCHARD LAW GROUP, APC
177 East Colorado Blvd., Suite 200
Pasadena, California 91105
Telephone: (213) 599-8255
Email: lonnieblanchard@gmail.com

Attorneys for Plaintiff Jacquelyn Weitz

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

Jacquelyn Weitz, on behalf of the State of
California pursuant to the Private Attorneys
General Act,

Plaintiff,

vs.

TakeLessons, Inc., and Does 1 through 10,
Defendants.

Case No. 37-2024-00007416-CU-OE-CTL
*(Assigned to the Hon. James Mangione –
Dept. C-75)*

**~~Proposed~~ Amended Order and
Judgment Approving PAGA Settlement**

The Court, having reviewed the Motion for Approval of PAGA Settlement and all pleadings, records, and other documentation on file in this case, and any oral testimony and/or argument of counsel, and good cause appearing therefor, orders as follows:

1. The Court incorporates by reference the definitions in the PAGA Settlement Agreement (“Settlement”) and the addendum filed as Exhibit 1, to the Declaration of Peter R. Dion-Kindem filed in support of the Motion for Approval and the Second Addendum to the PAGA Settlement

1 Agreement attached as Exhibit 1 to the Supplemental Declaration of Lonnie C. Blanchard filed
2 in support of the Motion for Approval.

3 2. The Court approves the Settlement and finds that it is fair, reasonable, and adequate and in the
4 best interests of the Parties, all PAGA Group Members, and the State of California and is a
5 reasonable compromise of disputed allegations.

6 3. Nothing in this Order shall constitute a finding that Defendant engaged in willful misclassification
7 of PAGA Group Members or otherwise violated any provision of California law, including the
8 Labor Code.

9 4. The Court approves the attorney's fees requested by PAGA Counsel and orders the payment of
10 \$450,000 to be paid from the Gross Settlement Amount as reasonable attorney's fees to PAGA
11 Counsel in accordance with the PAGA Settlement.

12 5. The Court finds that the costs incurred by PAGA Counsel are reasonable and orders the payment
13 of the following costs from the Gross Settlement Amount in accordance with the Settlement:

14 To Peter R. Dion-Kindem, P.C. the sum of \$5,067.14; and

15 To the Blanchard Law Group, APC the sum of \$4,097.50.

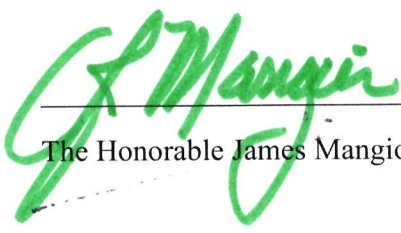
16 6. The Court finds that the \$10,000 payment by Defendant to Plaintiff in return for Plaintiff's general
17 release of claims against Defendant is reasonable and appropriate and orders the payment of
18 \$10,000 to Jacquelyn Weitz to be paid from the Gross Settlement Amount in accordance with the
19 Settlement.

20 7. The Court approves the Settlement Administration Expenses and orders the payment of \$6,874.00
21 to the Settlement Administrator to be paid from the Gross Settlement Amount in accordance with
22 the Settlement.

23 8. The Court approves the distribution of the Net Settlement in accordance with the Settlement, 75%
24 of which will be remitted to the Labor Workforce Development Agency and 25% of which will
25 be distributed to all PAGA Group Members in accordance with the Settlement.
26
27
28

- 1 9. Any uncashed checks or other cash residue from the Settlement shall be transmitted to *cy pres*
2 The Katherine and George Alexander Community Law Center.
3 10. As of the Effective Date of the Agreement and the payment of all consideration by Defendant
4 owing thereunder, Plaintiff and Aggrieved Employees will be deemed to have released the
5 Released PAGA Claims as to the Released Parties as provided in the Settlement.
6

7 DATED: 5/30/25

8  JAMES A. MANGIONE
9 The Honorable James Mangione
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PROOF OF SERVICE**

2 I am over the age of 18 and not a party to the within action. My business address is 3856 Davids
3 Road, Agoura Hills, CA 91301. On April 17, 2025, I served the following document(s) described as:

4 **[Proposed] Amended Order and Judgment Approving PAGA Settlement**

5 on interested parties in this action addressed as follows:

6 Karin M. Cogbill (State Bar No. 244606)	<i>Attorneys for Defendant TakeLessons, Inc.</i>
7 Diana Han (State Bar No. 340109)	Telephone: (408) 579-0404
JACKSON LEWIS P.C.	Email: Karin.Cogbill@jacksonlewis.com
8 160 W. Santa Clara St., Ste. 400	Diana.Han@jacksonlewis.com
9 San Jose, CA 95113	leticia.cvietkovich@jacksonlewis.com

10 **(By Mail)** I deposited such envelope with postage thereon fully prepaid in the United States
11 mail at a facility regularly maintained by the United States Postal Service at Los Angeles,
California.

12 xxx **(By Email)** Based on a court order, Rules of Court, or an agreement of the parties to accept
13 electronic service, I caused the documents to be sent to the person(s) at the email addresses set
forth above.

14 **(By Overnight Delivery)** I enclosed the documents in an envelope or package provided by an
overnight delivery carrier and addressed to the persons at the address(es) identified above. I
15 placed the envelope or package for collection and overnight delivery at an office or a regularly
utilized drop box of the overnight delivery carrier.

16 **(By Personal Service)**

17 By personally delivering copies to the person served.

18 I delivered such envelope by hand to the offices of the addressee pursuant to Code of
Civil Procedure Section 1011.

19 I declare under penalty of perjury under the laws of the State of California that the above is true
and correct. Executed on April 17, 2025.

20 

21 _____
22 Kale M. Morita