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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE**
10 **CIVIL COMPLEX CENTER**

11 DAVID A. GREENE, individually and as
12 representative of the State of California on
13 behalf of all aggrieved employees,

14 Plaintiff,

15 v.

16 KHALID M. ASIMI and HAMID M. ASIMI,
17 individuals doing business as Alert Security
18 Services in Corona, California, and DOES 1 -
19 20, inclusive,

20 Defendants.

Case No. 30-2024-01377249-CU-OE-CXC

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
FOR AN ORDER (1) APPROVING THE
SETTLEMENT OF PLAINTIFF'S
INDIVIDUAL PAGA CLAIMS AND
DISMISSING THOSE CLAIMS WITH
PREJUDICE AND (2) DISMISSING
PLAINTIFF'S PAGA CLAIMS ON
BEHALF OF THE OTHER AGGRIEVED
EMPLOYEES WITHOUT PREJUDICE**

Hearing Date: Thursday, October 3, 2024
Hearing Time: 2:00 p.m.
Hearing Location: Department CX104
Complaint Filed: February 1, 2024

21 **[Filed Concurrently With: (a) the Parties' Stipulation for an Order (1) Approving the**
22 **Settlement of Plaintiff's Individual PAGA Claims and Dismissing Those Claims With**
23 **Prejudice and (2) Dismissing Plaintiff's PAGA Claims on Behalf of the Other Aggrieved**
24 **Employees Without Prejudice; (b) Plaintiff's Unopposed Motion for an Order (1) Approving**
25 **the Settlement of Plaintiff's Individual PAGA Claims and Dismissing Those Claims With**
26 **Prejudice and (2) Dismissing Plaintiff's PAGA Claims on Behalf of the Other Aggrieved**
27 **Employees Without Prejudice; (c) Memorandum of Points and Authorities in Support of**
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1 U.S. Dollars (\$2,000.00) (75% of which or One Thousand Five Hundred U.S. Dollars (\$1,500.00) is
2 to be paid to the “Labor and Workforce Development Agency” [“LWDA”] and 25% of which or
3 Five Hundred U.S. Dollars [\$500.00] is to be paid to Plaintiff). Upon Defendants’ payment in full
4 of the Gross Settlement Amount described in the parties’ Settlement Agreement, Plaintiff’s counsel
5 shall promptly transfer to the LWDA and Plaintiff their respective shares of the settlement of
6 Plaintiff’s individual PAGA claims against the Defendants.
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8 2. The Court hereby dismisses with prejudice Plaintiff’s individual PAGA claims
9 against the Defendants.

10 3. The Court hereby dismisses with prejudice Plaintiff’s individual non-PAGA claims
11 against the Defendants.

12 4. The Court hereby dismisses without prejudice Plaintiff’s representative PAGA
13 claims against the Defendants on behalf of the other allegedly aggrieved employees of the
14 Defendants.
15

16 5. The Court hereby retains jurisdiction over this matter pursuant to California Code of
17 Civil Procedure 664.6 with regard to any future steps taken by any party to enforce the Settlement
18 Agreement.
19

20 **IT IS SO ORDERED.**

21 Dated: _____, 2024

Judge of the Superior Court of California,
County of Orange