JUSTICE FOR WORKERS, P.C.
William C. Sung, SB# 280792
E-Mail: william@justiceforworkers.com
Tiffany L. Luu, SB# 335127
E-Mail: tluu@justiceforworkers.com
3600 Wilshire Boulevard, Suite 1815
Los Angeles, CA 90010
Tel: 323-922-2000
Fax: 323-922-2000

S. Emi Minne (SBN 253179)
emi@parkerminne.com
Jill J. Parker (SBN 274230)
jill@parkermine.com
Yasmin Wilber (SBN 360905)
yasmin@parkerminne.com
PARKER & MINNE, LLP
700 South Flower Street, Suite 1000
Los Angeles, California 90017
Telephone: (310) 882-6833 / Fax: (323) 922-2000

Attorneys for Plaintiffs JIM HETZLER and LYNNORA VASQUEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JIM HETZLER and LYNNORA VASQUEZ, individually and on behalf of all others similarly situated;

Plaintiffs,

vs.

CANYON RIDGE HOSPITAL, INC., a California corporation; and DOES 1 through 50,

Defendants.

Case No.: CIVSB2412550

[Assigned for All Purposes to:
Hon. Thomas S. Garza, Dept. S27]

(PROPOSED) JUDGMENT AND ORDER GRANTING PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT, ATTORNEY'S FEES AND COSTS, AND REPRESENTATIVE ENHANCEMENT PAYMENTS

(Filed Concurrently with Motion for Approval of PAGA Settlement and Supporting Declarations)

DATE: June 3, 2027
TIME: 8:30 a.m.
DEPT: S27

Action Filed: April 11, 2024
Trial Date: Not Set

Plaintiffs Jim Hetzler and Lynnora Vasquez's (collectively, "Plaintiffs") Motion for Approval of California Private Attorneys General Act ("PAGA") Settlement, Attorney's Fees and Costs, and Representative Enhancement Payments (the "Motion") came on regularly for hearing before this Court on June 3, 2027 at 8:30 a.m. This Court, having considered the PAGA Settlement Agreement (the "Settlement" or "Agreement") between Plaintiffs and Defendant Canyon Ridge Hospital, Inc. ("Defendant"), Plaintiffs' Motion and Memorandum of Points and Authorities in support thereof, and supporting declarations filed therewith; and good cause appearing, **HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS**:

1. The Court, for purposes of this Judgment and Order, incorporates and adopts all defined terms and provisions as set forth in the Agreement, which was attached to the Declaration of William C. Sung in Support of Motion for Approval of PAGA Settlement as Exhibit 1.

2. The Court hereby GRANTS the Motion.

3. Plaintiffs exhausted all administrative remedies required to bring the PAGA claims asserted in this action and is authorized to act as a private attorney general with respect to the PAGA claims being released under the terms of the Settlement. The California Labor and Workforce Development Agency ("LWDA") was provided with notice of the Settlement via its online submission process and the LWDA has not made any objection to the Settlement.

4. The obligations set forth in the Settlement Agreement regarding the settlement of the Action are deemed part of this Judgment and Order, and the Parties and the Settlement Administrator are ordered to carry out the Settlement Agreement according to its terms and provisions.

5. Release of Claims. Upon entry of this Judgment and Order and full funding of the Gross Settlement Amount, all Aggrieved Employees, including Plaintiffs, 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 civil penalties which are or may be available under or through the PAGA for any violation of the Labor Code, Wage Orders, regulations, and/or any other provisions of state and federal law based on the facts that were alleged, or reasonably could have been alleged, based on the facts stated in the Operative

Complaint and the PAGA Notices arising during the PAGA Period. Any Aggrieved Employee covered by this Agreement will be barred from proceeding with any claim under PAGA arising during the PAGA Period and released by this Agreement, which includes PAGA penalties for alleged violation of California Labor Code sections 201, 202, 203, 204, 210, 216, 218.6, 226, 226.3, 226.7, 246, 256, 510, 512, 516, 558, 558.1, 1174, 1174.5, 1175, 1182.12, 1194, 1194.2, 1197, 1197.1, 1198, 1198.5, 1199, 2800, and 2802 and Industrial Welfare Commission Wage Orders, including inter alia, Wage Orders 4-2001 and 5-2001 ("Released Claims").

a. "Aggrieved Employees" means all current and former non-exempt employees who have worked, or continue to work, for Defendant in California during the PAGA Period, whether current or former employees.

b. The "Gross Settlement Amount" is $260,000.00.

c. The "PAGA Period" means the time period from March 12, 2023 through April 25, 2026.

d. "Released Parties" are Defendant Canyon Ridge Hospital, Inc. and each of its former, present and future direct or indirect parents, directors, officers, managers, employees, operators, doners, shareholders, principals, owners, members, administrators, divisions, fiduciaries, trustees, agents, attorneys, representatives, accountants, auditors, consultants, partners, insurers and reinsurers, predecessors, investors, benefit plans, heirs, successors, assigns, subsidiaries, affiliates, any DBAs, and any other individual or entity that could be jointly liable with any of them, including without limitation UHS of Delaware, Inc. and Universal Health Services, Inc.

6. The Settlement is not an admission by Defendant, nor is this Judgment and Order a finding of the validity of any allegations or of any wrongdoing by Defendant. Neither this Judgment and Order, the Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement, may be used as an admission of any fault, wrongdoing, omission, concession, or liability whatsoever by or against Defendant.

7. The Court appoints Phoenix Settlement Administrators as the Administrator.

8. Defendant shall pay the Gross Settlement Amount within 30 calendar days of the Effective Date.

9. Within 14 days after Defendant pays the Gross Settlement Amount, the Administrator shall disburse the Gross Settlement Amount as follow:

a. A payment in the amount of $95,124.05, payable to the LWDA for civil penalties pursuant to PAGA;

b. Individual PAGA Payments totaling $31,708.01, payable to the Aggrieved Employees on a pro rata basis in accordance with the formula set forth in the Agreement for civil penalties pursuant to PAGA along with the explanatory letter attached as Exhibit 1 to the Agreement;

c. An award of $91,000.00 to PAGA Counsel for attorney's fees pursuant to PAGA, broken down as $63,700.00 to Justice for Workers, P.C. and $27,300.00 to Parker & Minne, LLP.

d. An award of $26,217.94 to PAGA Counsel for attorney's costs pursuant to PAGA, broken down as $17,126.59 to Justice for Workers, P.C. and $9,091.35 to Parker & Minne, LLP for attorney's costs pursuant to PAGA;

e. Representative Enhancement Awards in the amount of $5,000.00 to Plaintiff Hetzler and $5,000.00 to Plaintiff Vasquez;

f. A payment in the amount of $5,950.00 to the Administrator for settlement administration costs.

10. The Parties shall bear their own respective attorney's fees and costs, except as otherwise provided for in the Settlement and approved by the Court. Defendant and the Released Parties shall have no further liability for costs, expenses, interests, attorney's fees, or for any other charge, expense, or liability relating to the Released Claims and shall be released from all claims as set forth in the Agreement and in this Judgment and Order.

11. Plaintiffs shall submit a copy of this Judgment and Order to the LWDA within 14 calendar days after entry of this Judgment and Order.

12. This Judgment and Order is intended to be a final disposition in its entirety of the above-captioned action. Pursuant to California Code of Civil Procedure section 664, this Court shall retain jurisdiction over the Parties, Actions, and the Settlement Agreement solely for purposes of (i)

enforcing the Settlement Agreement and/or this Judgment and Order, (ii) addressing settlement administration matters, and (iii) addressing such post-Judgment matters as are permitted by law.

13. The Court sets a Non-Appearance Case Review Re: Settlement Distribution on _____ at ___ a.m. in Department S27. Plaintiff is ordered to file a final report and declaration by the Settlement Administrator regarding settlement distribution no later than 5 court days prior to the hearing.

IT IS SO ORDERED. ADJUDGED, AND DECREED.

DATED: _____, 2026

_____
Hon. Thomas S. Garza
Judge of the Superior Court