

SULLIVAN EMPLOYMENT LAW P.C.
Martin E. Sullivan, CA Bar No 274279
martin@sullivanlawgrp.com
145 S. Spring Street, Ste. 850
Los Angeles, CA 90012
Tel: (323) 645-5470

Attorneys for Plaintiffs and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

ANDRES QUIJANO, an individual, on
behalf himself and all others similarly
situated,

Plaintiff,

v.

SOUTH ITALIA HUNTINGTON
BEACH, LP, a California Limited
Partnership, and DOES 1 TO 50,
Defendants.

CASE NO.: 24STCV08676
[Unlimited Jurisdiction]

*[Assigned for all purposes to Dept. 1, Hon.
Theresa M. Traber]*

[PROPOSED] JUDGMENT

Hearing Date: December 8, 2025
Time: 10:30 a.m.
Dept.: 1
Judge: Hon. Theresa M. Traber

1 **[PROPOSED] JUDGMENT**

2 1. The Court hereby enters final judgment in this Action in accordance with terms
3 of Amended Joint Stipulation Of Settlement And Release (the “Settlement Agreement”) thereto,
4 order granting preliminary approval of class action settlement (“Preliminary Approval Order”),
5 and the order granting final approval of the class action settlement (“Final Order”). A copy of the
6 Final Order is attached hereto as Exhibit “A” and incorporated herein by this reference.

7 2. Upon full and final payment by Defendant of the Gross Settlement Amount,
8 consistent with Paragraph 2.7 of the Settlement as amended, Plaintiff/Class Representative and
9 all participating Class Members, and all PAGA Aggrieved Employees, as those terms are
10 respectively defined in the Settlement, shall have by operation of the Final Order and this
11 Judgment, fully, finally and forever released, relinquished, and discharged the Released Parties
12 from the Released Class Claims, the Released PAGA Claims, and the Plaintiff’s Claims, Known
13 and Unknown, against Defendant, as those terms are respectively defined in the Settlement, and
14 are hereby forever barred and enjoined from prosecuting such released claims against the
15 Released Parties, as that term is defined in the Settlement.

16 3. Without affecting the finality of the Final Order and/or this Judgment, pursuant to
17 California Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of
18 Court, the Court reserves exclusive and continuing jurisdiction over this Action, Plaintiff,
19 Settlement Class Members, PAGA Aggrieved Employees, and Defendant for the purposes of
20 supervising the implementation, enforcement, construction, and interpretation of the Settlement,
21 Preliminary Order, the Final Order, and the Judgment.

22 4. This final judgment is intended to be a final disposition of the above-captioned
23 action in its entirety and is intended to be immediately appealable. This final judgment resolves
24 and extinguishes all claims released by the Settlement against Defendant.

25 **IT IS SO ORDERED.**

26 Dated: _____

27 _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Judge of the Superior Court, County of Los
Angeles

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28