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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

BERENISE CABALLERO, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

NATIONAL LABS INC., a Nevada
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24CV083753

**[PROPOSED] ORDER APPROVING
SETTLEMENT AND JUDGMENT THEREON**

Date: November 20, 2025

Time: 9:00 a.m.

Dept.: 24

Reservation ID. 668887836845

Complaint Filed: July 17, 2024

Trial Date: None

1 The motion of Plaintiff Berenise Caballero (“Plaintiff”) for an order approving the
2 settlement of the above-captioned action and entering judgment thereon (“Motion”) having come
3 before the Court, and the Court being duly apprised of the premises, and GOOD CAUSE
4 appearing,

5 **IT IS HEREBY ORDERED** that the Motion shall be and is granted and the settlement
6 of this action is hereby approved.

7 **IT IS FURTHER ORDERED** as follows:

8 1. Capitalized terms in this Approval Order shall have the same meaning they are
9 given in the Settlement Agreement and Release of PAGA Claims (“Agreement” or “Settlement
10 Agreement”) attached as **Exhibit C** to the Declaration of Kristen M. Agnew filed in support of
11 the Motion;

12 2. Phoenix Settlement Administrators is approved to serve as the Settlement
13 Administrator and is hereby authorized to perform all of the duties assigned to it in the
14 Settlement Agreement, including the disbursement of funds from the Total Settlement Payment
15 in accordance with the terms of the Settlement Agreement, as follows:

16 a. The Net PAGA Settlement Fund, totaling \$9,551.24, shall be distributed
17 as follows: (i) \$7,163.43 shall be paid to the LWDA for PAGA penalties;
18 and (ii) \$2,387.81 shall be distributed to PAGA Settlement Members in
19 accordance with the Settlement Agreement

20 b. The Fee and Expense Award, totaling \$6,666.66 in attorneys’ fees and
21 \$832.10 in costs, shall be paid to Diversity Law Group;

22 c. The Service Payment in the amount of \$1,500.00 to Plaintiff; and

23 d. The Settlement Administration Costs, totaling \$1,450.00, shall be paid to
24 Phoenix Settlement Administrators.

25 3. Upon the payment of the Total Settlement Payment, the State of California and all
26 PAGA Settlement Members (including Plaintiff) are hereby deemed to have, and by operation of
27 this Approval Order and Judgment shall have, expressly released, waived, and discharged the
28 Released Parties from the Released Claims, and shall be bound by this Approval Order and

1 Judgment and be forever barred from suing the Released Parties on any of the Released Claims.

2 4. Judgment shall be entered forthwith in accordance with the foregoing, with each
3 party to pay her or its own attorneys' fees and costs except as expressly set forth in the
4 Settlement Agreement.

5 5. The Court shall retain jurisdiction for purposes of ensuring compliance with the
6 terms of the Agreement and this Order, pursuant to Code of Civil Procedure § 664.6.

7 6. The Court sets a Final Distribution Hearing for _____, 2026,
8 at _____ a.m./p.m., in Department _____. Fourteen (14) calendar days prior to
9 the hearing, Plaintiff shall file a declaration from the settlement administrator detailing the
10 distribution.

11 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

12 Dated: _____, 2025

13 _____
14 HON. REBEKAH EVENSON
15 SUPERIOR COURT OF CALIFORNIA
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