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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

WISSAM SAAB, an individual, on behalf of
the State of California, as a private attorney
general,

PLAINTIFF,

v.

FAB4 LLC DBA VAN NUYS CHRYSLER
DODGE JEEP RAM; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 24STCV21636

[Case Assigned for All Purposes to Hon. Alison
Mackenzie in Dept. 55]

**[PROPOSED] ORDER GRANTING
APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Date: May 7, 2026

Time: 8:30 AM

Dept.: 55

Complaint Filed: August 26, 2024

Trial Date: April 27, 2026

Reservation No. 553389334064

1 **[PROPOSED] ORDER**

2 The Motion for Approval of Representative Action Settlement (“Motion”) came before this
3 Court, the Honorable Alison Mackenzie, presiding. The Court, having considered the papers
4 submitted in support of the motion of the Parties, **HEREBY ORDERS THE FOLLOWING:**

5 Having considered Plaintiff’s Motion, and all legal authorities and documents submitted
6 in support thereof, including the PAGA Settlement Agreement (“Agreement”), attached to
7 the Szamet Declaration as Exhibit “1”, and good cause appearing, IT IS HEREBY ORDERED
8 that Plaintiff’s Motion is GRANTED, subject to the following findings and orders:

- 9 1. The Court finds the Settlement is fair and reasonable.
- 10 2. The Court approves the Gross Settlement Amount of \$100,000.00¹.
- 11 3. The Court approves the PAGA Penalties in the amount of \$43,653.90.
- 12 4. The Court approves 65% of the PAGA Penalties being allocated to the LWDA in
13 the amount of \$28,375.03.
- 14 5. The Court approves 35% of the PAGA Penalties being allocated to the Aggrieved
15 Employees in the amount of \$15,278.87.
- 16 6. The Court approves PAGA Counsel’s request for attorney fees of \$33,333.33.
- 17 7. The court approves the PAGA Counsel’s request for reimbursement of case costs
18 in the amount of \$13,512.77.
- 19 8. The Court approves the settlement administration costs of \$4,500.00.
- 20 9. The Court approves an Enhancement Payment to Plaintiff WISSAM SAAB of
21 \$5,000.00.
- 22 10. The Parties are ordered to carry out the terms of the Agreement.
- 23 11. This order covers and bars other PAGA claims that have been asserted, or
24 reasonably could be asserted, by other representative Plaintiff(s) based on the facts
25 stated in the Operative Complaint and the PAGA Notice and/or ascertained in the
26 course of the Action including, but not limited to, any claims for civil penalties

27

¹ Unless otherwise defined herein, all capitalized terms shall have the meaning assigned to them
28 in the Agreement.

1 based on Defendant’s alleged: (a) failure to pay minimum, straight time, and
2 overtime wages; (b) failure to provide legally compliant meal periods or pay meal
3 period premiums; (c) failure to authorize and permit rest periods or pay rest period
4 premiums; (d) failure to pay all earned wages twice per month; (e) failure to
5 maintain accurate records of hours worked and meal periods; (f) failure to pay all
6 commissions owed; (g) failure to timely pay final wages at termination; (h) failure
7 to furnish accurate wage statements, and (i) failure to reimburse or indemnify all
8 necessary business expenses.

9
10 **DATED:** _____
11 **JUDGE OF THE SUPERIOR COURT**

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 10, 2026, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER GRANTING APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

CALLAHAN THOMPSON SHERMAN & CAUDILL LLP

Robert W. Thompson

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Jack T. Ritchie

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Attorneys for Defendant

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 10, 2026, at West Hollywood, California.



Taylor Gregg