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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CALAVERAS

ALLYSON FOOTE, JASON ROSS, and
COURTNEY JONES, individually, and on behalf
of all others similarly situated,

Plaintiffs,

v.

GOTTA LUV PIZZA, a California corporation;
GOTTA LUV PIZZA INC DBA ROUND TABLE
PIZZA #05, an unknown entity; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 24CV47525

*[Assigned for All Purposes to the Hon. David
M. Sanders, Dept. 2]*

**[PROPOSED] JUDGMENT AND ORDER
GRANTING PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: August 28, 2026

Time: 9:00 a.m.

Dept.: 2

Complaint filed: July 31, 2024

FAC filed: November 21, 2024

SAC filed: June 3, 2025

Trial date: Not set

1 Plaintiffs Allyson Foote, Jason Ross, and Courtney Jones’s (“Plaintiffs”) Motion for
2 Final Approval of Class Action and PAGA Settlement came before this Court on August 28,
3 2026, at 9:00 a.m., in Department 2 of the Superior Court of California, County of Calaveras,
4 located at 400 Government Center Drive, San Andreas, CA 95249. Plaintiffs now seek an order
5 granting final approval of the Class Action and PAGA Settlement Agreement (“Settlement
6 Agreement”) between Plaintiffs and Defendants Gotta Luv Pizza and Gotta Luv Pizza Inc. dba
7 Round Table Pizza #05 (“Defendants”) (Plaintiffs and Defendants collectively, the “Parties”),
8 a copy of which is attached to the Declaration of Tyler J. Woods in Support of Plaintiffs’ Motion
9 for Preliminary Approval of Class Action and PAGA Settlement as **Exhibit 1**. On April 17,
10 2026, this Court issued an Order Granting Plaintiffs’ Motion for Preliminary Approval of Class
11 Action and PAGA Settlement (“Preliminary Approval Order”). In accordance with the
12 Preliminary Approval Order, Class Members have been given notice of the terms of the
13 Settlement and the opportunity to comment on or object to it or to exclude themselves from its
14 provisions.

15 Having received and considered the Settlement Agreement, the supporting papers filed
16 by the Parties, and the evidence and argument in conjunction with the Motion for Preliminary
17 Approval of Class Action and PAGA Settlement granted on April 17, 2026, and the instant
18 Motion for Final Approval of Class Action and PAGA Settlement and supporting papers, as
19 well as oral argument presented to the Court, the Court grants final approval of the Settlement
20 and HEREBY ORDERS AND MAKES THE FOLLOWING DETERMINATIONS:

21 1. This Court has jurisdiction over the subject matter of the action and over the Parties,
22 including all Settlement Class Members.

23 2. The Court finds that the Class, as defined below, is properly certified as a class for
24 settlement purposes only: all current and former hourly non-exempt employees who performed
25 work for Defendants in California during the Class Period.

26 3. “Class Period” means the period from July 31, 2020, to April 17, 2026.

27 4. The Court appoints Plaintiffs Allyson Foote, Jason Ross, and Courtney Jones as
28 Class Representatives for settlement purposes only.

1 5. The Court appoints Tyler Woods, Giancarlo Recinos, James Yoo, Ruby Carrera and
2 Courtney M. Miller of Wilshire Law Firm, PLC as Class Counsel for settlement purposes only.

3 6. Pursuant to the Preliminary Approval Order, Class Notice was sent to each Class
4 Member by first-class mail. These papers informed Class Members of the terms of the Settlement,
5 their right to receive a settlement share, their right to comment on or object to the Settlement or to
6 opt out of the Settlement and pursue their own remedies, and their right to appear in person or by
7 counsel at the Final Approval Hearing and be heard regarding approval of the Settlement. Adequate
8 periods of time were provided by each of these procedures.

9 7. No Class Members objected to the Settlement.

10 8. No Class Members requested exclusion from the Settlement.

11 9. The Court finds and determines that this notice procedure afforded adequate
12 protections to Class Members and provides the basis for the Court to make an informed decision
13 regarding approval of the Settlement based on the responses of Class Members. The Court finds
14 and determines that the notice provided in this case was the best notice practicable, which satisfied
15 the requirements of law and due process.

16 10. The Court finds the Settlement was entered into in good faith, that the Settlement is
17 fair, reasonable and adequate, and that the Settlement satisfies the standards and applicable
18 requirements for final approval of this class action settlement under California law, including the
19 provisions of California Code of Civil Procedure section 382 and California Rules of Court, Rule
20 3.769.

21 11. Class Members who have not opted out will be bound by the Settlement, except
22 Aggrieved Employees will release the PAGA claims released in the Settlement and will receive a
23 portion of the amount set aside for their share of the settlement of civil penalties, regardless of
24 whether they opt out of the Settlement.

25 12. The Court finds that Plaintiffs notified the Labor and Workforce Development
26 Agency (“LWDA”) of the Settlement in accordance with the notice requirements of California
27 Labor Code § 2699(s).

28 13. Defendant shall fully fund the Gross Settlement Amount and the amounts necessary

1 to fully pay Defendants' share of payroll taxes by transmitting the funds to the Administrator as
2 follows. The Gross Settlement Amount shall be payable in three (3) equal installments, with the
3 first installment due 60 days following Final Approval and the remaining two (2) installments due
4 at six-month intervals thereafter. Defendants' share of payroll taxes shall be payable no later than
5 the date of the third installment payment of the Gross Settlement Amount.

6 14. Within 14 days after Defendant fully funds the GSA and the Effective Date has
7 passed, the Administrator will mail checks for all Individual Class Payments, all Individual PAGA
8 Payments, the LWDA PAGA Payment, the Administration Costs Payment, the Class Counsel Fees
9 Payment, the Class Counsel Litigation Expenses Payment, and the Class Representative Service
10 Payments. Disbursement of the Class Counsel Fees Payment, the Class Counsel Litigation
11 Expenses Payment, and the Class Representative Service Payments shall not precede disbursement
12 of Individual Class Payments and Individual PAGA Payments.

13 15. The "Effective Date" is defined as the date by which both of the following have
14 occurred: (a) the Court enters a Judgment on its Order Granting Final Approval of the Settlement;
15 and (b) the Judgment is final. The Judgment is final as of the latest of the following occurrences:
16 (a) if no Participating Class Member objects to the Settlement, the day the Court enters Judgment;
17 (b) if one or more Participating Class Members objects to the Settlement, the day after the deadline
18 for filing a notice of appeal from the Judgment; or (c) if a timely appeal from the Judgment is filed,
19 the day after the appellate court affirms the Judgment and issues a remittitur.

20 16. In addition to any recovery Plaintiffs may receive under the Settlement, and in
21 recognition of Plaintiffs' efforts on behalf of the Class, the Court hereby approves payment from
22 the Gross Settlement Amount of a Class Representative Service Payment to Plaintiffs Allyson
23 Foote, Jason Ross, and Courtney Jones in the amount of \$10,000.00 each (\$30,000.00 total).

24 17. The Court approves payment from the Gross Settlement Amount for civil penalties
25 under PAGA in the amount of \$20,000.00, with the LWDA to receive 65% (\$13,000.00), and the
26 remaining 35% (\$7,000.00) to be distributed to Aggrieved Employees, defined as all current and
27 former hourly non-exempt employees who performed work for Defendants in California during
28

the PAGA Period from June 21, 2023, to April 17, 2026. The Court finds and determines that such payment is fair, reasonable, and appropriate.

18. The Court approves payment from the Gross Settlement Amount for attorneys' fees to Class Counsel in the amount of \$150,000.00, and the reimbursement of litigation costs in the amount \$22540.68. Both are reasonable amounts. The reasonableness of the fee award is determined based on a reasonable percentage of the common fund obtained for the Class. The Court also has considered the "lodestar amount." Awarding fees on a percentage basis encourages efficient litigation practices and reflects the actual benefit obtained for the Class.

19. The Court approves payment from the Gross Settlement Amount for settlement administration services in the amount of \$7,500.00 to the Settlement Administrator, ILYM Group, Inc.

20. Individual Settlement Payments checks will be valid for 180 days after mailing by the Settlement Administrator. If a Class Member fails to cash the check for his or her Individual Settlement Payment within 180 days after it is mailed to him or her, the Settlement Administrator will distribute the funds represented by the check to the California State Controller's Office, Unclaimed Property Division, in the name of the Class Member.

21. Effective on the date when Defendant fully funds the Gross Settlement Amount and all employer payroll taxes owed on the Wage Portion of the Individual Class Payments, Plaintiffs, Class Members, and Class Counsel will release claims against all Released Parties as follows:

(a) Released Class Claims: "All Participating Class Members release the Released Parties from all claims that were alleged, or reasonably could have been alleged, based on the Class Period facts stated in the Operative Complaint."

(b) Released PAGA Claims: "Aggrieved Employees, including Non-Participating Class Members who are Aggrieved Employees, are deemed to release the Released Parties from all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA Period facts stated in the Operative Complaint and the PAGA Notice."

1 22. The Parties and Administrator are hereby ordered to comply with the terms of the
2 Settlement.

3 23. The Parties shall bear his, her, its, or their own respective attorneys' fees and costs
4 except as otherwise provided in the Settlement and this Judgment and Order Granting Final
5 Approval of Class Action and PAGA Settlement.

6 24. Without affecting the finality of this order in any way, pursuant to California Code
7 of Civil Procedure section 664.6 the Court retains jurisdiction of all matters relating to the
8 interpretation, administration, implementation, effectuation, and enforcement of this order and the
9 Settlement.

10 25. The Court hereby enters final judgment in accordance with the terms of the
11 Settlement, the Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action and
12 PAGA Settlement, and this Order Granting Plaintiffs' Motion for Final Approval of Class Action
13 and PAGA Settlement, subject to the Court's retention of continuing jurisdiction over the Action
14 and the Settlement, including jurisdiction pursuant to California Rule of Court 3.769(h), solely for
15 purposes of (a) enforcing the Agreement, (b) addressing settlement administration matters, and (c)
16 addressing such post-Judgment matters as may be appropriate under court rules or applicable law.

17 26. A Settlement Compliance Hearing is set for _____, at _____ a.m./p.m. or a
18 date and time soon thereafter more convenient for the Court: _____, at
19 _____ a.m./p.m. in Department 2 of the above-captioned Court.

20 27. A final report from the Settlement Administrator indicating that disbursements were
21 made pursuant to the Settlement shall be filed no later than 15 days prior to the Settlement
22 Compliance Hearing. If the Court is satisfied that the settlement funds have been fully distributed,
23 no appearance will be required at the Settlement Compliance Hearing.

24 **IT IS SO ORDERED.**

25
26 Dated: _____

27 _____
28 HONORABLE DAVID M. SANDERS
 JUDGE OF THE SUPERIOR COURT