

Nicholas J. Ferraro (State Bar No. 306528)
Lauren N. Vega (State Bar No. 306525)
Ferraro Vega Employment Lawyers, Inc.
3333 Camino del Rio South, Suite 300
San Diego, California 92108
(619) 693-7727 main / (619) 350-6855 fax
nick@ferrarovega.com / lauren@ferrarovega.com /

Clerk of the Superior Court
By T. Automation ,Deputy Clerk

Attorneys for Plaintiff Arik Papa

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ARIK PAPA, *et al.*,

Plaintiff,

v.

GEOCON INC., *et al.*,

Defendants.

Case No. 37-2024-00029093-CU-OE-CTL

*Hon. Wendy M. Behan
Dept. 66*

**Notice of Entry of Order Granting Approval
of PAGA Action Settlement and Attorneys'
Fees and Costs and Entering Judgment**

Action Filed: June 20, 2024

1 THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD, PLEASE TAKE
2 NOTICE THAT:

- 3 1. On November 14, 2025, at 10:15 a.m. in this Department, the Court entered the Order Granting
4 Approval of PAGA Action Settlement and Attorneys' Fees and Costs and Entering Judgment
5 attached hereto as Exhibit 1.
- 6 2. The Judge confirmed the Court's Tentative Ruling attached hereto as Exhibit 2.
- 7 3. A conformed copy of this Notice will be submitted to the LWDA via its online electronic portal
8 in accordance with Labor Code § 2699(s)(3).
- 9 4. Notice of the Court's final ruling and entry of judgment is hereby provided.

10 Respectfully submitted,

11 Dated: December 2, 2025

Ferraro Vega Employment Lawyers, Inc.

13 

14 Nicholas J. Ferraro

15 Lauren N. Vega

16 Attorneys for Plaintiff Arik Papa

EXHIBIT 1

#47-48

RECEIVED
October 20, 2025

FILED
San Diego Superior Court

NOV 14 2025

Clerk of the Superior Court
By: B. Orihuela, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ARIK PAPA, *et al.*

Plaintiff,

vs.

GEOCON INC., *et al.*

Defendants.

Case No. 37-2024-00029093-CU-OE-CTL

Hon. Wendy M. Behan
Dept. 66

**[Proposed] Order Granting Approval of
PAGA Action Settlement and Attorneys'
Fees and Costs and Entering Judgment**

Motion for PAGA Approval Hearing:

Date: November 14, 2025

Time: 10:15 a.m.

[Filed concurrently with Plaintiff's Notice of
Motion and Motion for Approval of PAGA
Action Settlement, Plaintiff's Memorandum of
Points and Authorities, Declaration of Nicholas J.
Ferraro, and Declaration of Arik Papa]

Action Filed: June 20, 2024

**[Proposed] Order Granting Approval of PAGA Action Settlement
and Attorneys' Fees and Costs and Entering Judgment**

1 This matter came on for hearing on November 14, 2025 at 10:15 a.m. in Department 66 of the
2 above-captioned Court, the Honorable Wendy M. Behan presiding, on Plaintiff's Motion for Approval
3 of PAGA Action Settlement and Attorneys' Fees and Costs.

4 Having received and considered the Motion and supporting Memorandum of Points and
5 Authorities, Declaration of Nicholas J. Ferraro (and its exhibits), Declaration of Arik Papa, including
6 the PAGA Settlement Agreement ("Settlement"), the Court makes the following determinations and
7 orders:

8 Plaintiff's PAGA notice, Plaintiff's Complaint, and the Parties' fully executed long form PAGA
9 Settlement Agreement are incorporated by reference. Terms used in this Order are derived from the
10 PAGA Settlement Agreement. The PAGA Period is defined as June 10, 2024, through PAGA approval.
11 The PAGA Members means all individuals currently or formerly employed by Geocon in California as
12 hourly, non-exempt employees during the PAGA Period... June 10, 2024, through PAGA approval.

13 Plaintiff's Motion for Approval of PAGA Action Settlement and Attorneys' Fees and Costs is
14 **GRANTED** and approved pursuant to California Labor Code section 2699(s)(2). After the attorneys'
15 fees, individual representative service payment, costs, and administrator's expenses are deducted from
16 the Gross Settlement Amount, the total PAGA Penalties Amount is \$138,243, of which 75%
17 (\$103,682.25) shall be distributed to the LWDA and the remaining 25% (\$34,560.75) shall be
18 distributed to the aggrieved employees as their share of PAGA penalties.

19 Accordingly, the \$275,000 gross settlement shall be distributed as follows:

- 20 1. \$103,682.25 to the Labor and Workforce Development Agency for PAGA penalties
- 21 2. \$41,959.89 to the PAGA Employees
- 22 3. \$10,000 to Plaintiff
- 23 4. \$91,657.50 to Plaintiff's counsel for attorneys' fees
- 24 5. \$17,700.36 to Plaintiff's counsel for costs
- 25 6. \$10,000 to the Settlement Administrator (any remaining unused fees will be shared with the
26 PAGA members)

27 Plaintiff, Defendant, and the Settlement Administrator are ordered to carry out the terms of the
28 settlement in accordance with the Settlement Agreement.

1 Upon the Effective Date of this Order, Defendant and the Released Parties shall be entitled to a
2 full and complete release of the Released Claims from the PAGA Members and a full and complete
3 release from Plaintiff. The "Released Claims" for the PAGA Members are the PAGA claims alleged,
4 and/or could have been alleged, arising out of the facts alleged in Plaintiff's Complaint and PAGA
5 Notice during the PAGA Period, including, without limitation, penalties predicated on the underlying
6 alleged violations for civil penalties under PAGA (Labor Code §§ 2698 *et seq.*).

7 This Settlement (including this Order) cannot be used, directly or indirectly, to introduce, use,
8 or admit in this case or in any other judicial, arbitral, administrative, investigative or other forum or
9 proceeding, as purported evidence of any violation of any federal, state, or local law, statute, ordinance,
10 regulation, rule or executive order (i.e., evidence of a "first" or "initial" violation), or any liability,
11 obligation, or duty at law or in equity, or for any other purpose. This Settlement (including this Order)
12 shall not be construed to be an admission by Defendant of any liability or wrongdoing as to Plaintiff,
13 the PAGA Members, or any other person, and Defendant specifically disclaims any such liability or
14 wrongdoing.

15 Without affecting the finality of this Order or the entry of judgment in any way, the Court retains
16 jurisdiction on all matters relating to the interpretation, administration, implementation, and
17 enforcement of this Order and the Settlement.

18 The Court hereby ENTERS JUDGMENT in accordance with the terms of the Settlement, in
19 accordance with this Approval Order and Judgment.

20
21 **IT IS SO ORDERED.**

22
23 Date: 11/14/25

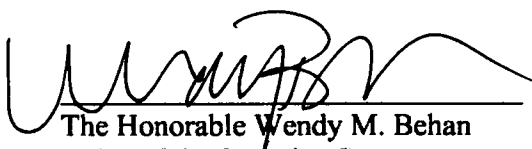

The Honorable Wendy M. Behan
Judge of the Superior Court

EXHIBIT 2

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO
CENTRAL COURTHOUSE**

TENTATIVE RULINGS - November 13, 2025

HEARING DATE: Nov. 14, 2025 HEARING TIME: 10:15 a.m. DEPT.: 66

JUDICIAL OFFICER: W. Behan

CASE NO.:37-2024-00029093-CU-OE-CTL

CASE TITLE: Papa vs Geocon West Inc [E-FILE]

CASE TYPE: (U)Other Employment

HEARING TYPE:

Plaintiff's unopposed Motion for Approval of PAGA Action Settlement and Attorneys' Fees and Costs is GRANTED. The PAGA Approval is GRANTED. The court will sign the judgment/order at ROA 23.