

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

JAN 21 2026

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE**

MATTHEW BAUMANN on behalf of
all others similarly situated, and on
behalf of the general public ,

Plaintiffs,

v.

ATP INVESTMENT COMPANY, LLC
DBA AUDI FLETCHER JONES; and
DOES 1-100,

Defendants.

Case No. 30-2024-01427099-CU-OE-CXC

*[Assigned for All Purposes to the
Honorable William D. Claster; Dept. CX101]*

**SECOND REVISED ~~[PROPOSED]~~ ORDER
GRANTING PLAINTIFF MATTHEW
BAUMANN'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: January 16, 2026

Time: 9:00 a.m.

Reservation No.: 74707309

Complaint Filed: September 23, 2024

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1 Settlement ("Final Order"). All terms used herein shall have the same meaning as defined in the
2 Settlement Agreement.

3 16. Upon the Effective Date, as defined in the Settlement Agreement, Plaintiff and all
4 Aggrieved Employees, shall have by operation of the Final Order and this Judgment, fully, finally
5 and forever released, relinquished, and discharged the Released Parties from the Released Claims
6 as those terms are respectively defined in the Settlement Agreement.

7 17. Without affecting the finality of the Final Order and/or this Judgment, pursuant to
8 California Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of
9 Court, the Court reserves exclusive and continuing jurisdiction over this Action, the Plaintiff,
10 Aggrieved Employees, and Defendant for the purposes of supervising the implementation,
11 enforcement, construction, and interpretation of the Settlement Agreement, Final Order, and
12 Judgment.

13 18. The Parties will comply with CRC Rule 3.771(b), by posting a copy of this Order
14 and Judgment on the settlement administrator's website for a period of sixty (60) days.

15
16 Dated: _____

1-21-26



Honorable William D. Claster

Exhibit A

CALIFORNIA SUPERIOR COURT, COUNTY OF ORANGE
Matthew Baumann v. ATP Investment Company, LLC dba Audi Fletcher Jones
Case No. 30-2024-01427099-CU-OE-CXC

NOTICE OF SETTLEMENT

*This is not a solicitation.
This is not a lawsuit against you and you are not being sued.*

The California Superior Court, County of Orange has granted approval of a settlement in the above-captioned action. Because your rights are affected by this Settlement, it is important that you read this Notice of Settlement ("Notice") carefully. The purpose of this Notice is to provide a brief description of the claims alleged in the action and the key terms of the settlement.

Based on the Company's records, your Individual PAGA Payment is \$ _____. This is based on the Company's records showing that you worked _____ pay periods during the PAGA Period of June 25, 2023, through September 21, 2025.

WHAT INFORMATION IS IN THIS NOTICE

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1. *Why Have I Received This Notice?*

ATP Investment Company, LLC dba Audi Fletcher Jones's (hereinafter referred to as "Defendant") records indicate that you worked as a non-exempt, hourly employee for Defendant in the State of California at some time between June 25, 2023, through September 21, 2025.

A settlement hearing was held on January 16, 2026, in the California Superior Court, County of Orange. The Court granted approval of the settlement. You are receiving this Notice to provide you with a brief description of the settlement and explain why you have received a settlement check.

2. *What Is This Case About?*

The action entitled *Matthew Baumann v. ATP Investment Company, LLC dba Audi Fletcher Jones*, was commenced by Plaintiff Matthew Baumann ("Plaintiff") in the Orange County Superior Court (Case Number 30-2024-01427099-CU-OE-CXC).

On June 25, 2024, Plaintiff provided notice to the California Labor and Workforce Development Agency ("LWDA") of the Private Attorneys General Act of 2004 ("PAGA") violations she alleged against Defendant.

On September 23, 2024, Plaintiff filed a PAGA complaint in the Orange County Superior Court against Defendant. The complaint alleged causes of action on behalf of Plaintiff and those similarly situated aggrieved employees under the PAGA for Defendant's alleged failure to pay all straight time wages, failure to pay all overtime wages,

failure to provide lawful meal periods, failure to provide lawful rest periods, failure to provide compliant wage statements, and failure to pay all wages due at termination.

The Court has not made any determination as to whether the claims advanced by Plaintiff have any merit. In other words, the Court has not determined whether any laws have been violated, nor has it decided in favor of Plaintiff or Defendant; instead, both sides agreed to resolve the lawsuit with no decision or admission of who is right or wrong. By agreeing to resolve the lawsuit, all parties avoid the risks and cost of a trial.

Defendant expressly denies that it did anything wrong or that it violated the law and further denies any liability whatsoever.

3. *Who Are the Attorneys Representing the Parties?*

Attorneys for Plaintiff Matthew Baumann	Attorneys for Defendant ATP Investment Company, LLC dba Audi Fletcher Jones
MARA LAW FIRM, PC David Mara dmara@maralawfirm.com Jill Vecchi jvecchi@maralawfirm.com 3160 Camino Del Rio South, Suite 207 San Diego, CA 92108 Telephone: (619) 234-2833	FISHER & PHILLIPS LLP Karl R. Lindegren Spencer W. Waldron 2050 Main Street, Suite 1000 Irvine, California 92614 Telephone: (949) 851-2424

4. *How Does This Settlement Affect My Rights? What are the Released Claims?*

All non-exempt, hourly employees who worked for Defendant in California at any time from June 25, 2023, through September 21, 2025 (referred to in this notice as "Aggrieved Employees") release the Released Parties from the Released Claims, as defined below.

Released Parties: Defendant including its past, present, and future divisions, affiliates, parents, subsidiaries, predecessors, successors, assigns, members, shareholders, owners, officers, directors, employees, agents, trustees, attorneys, representatives, administrators, fiduciaries, beneficiaries, subrogees, executors, partners, and privies.

Released Claims: Each PAGA Aggrieved Employee shall fully release and discharge Defendant and the Released Parties from any and all claims for civil penalties under the Private Attorneys General Act of 2004 ("PAGA") that were alleged or could have been alleged based on the claims, facts, and/or allegations contained in operative Complaint and in the PAGA Notice submitted by Plaintiff to the LDWA. The release shall be for the PAGA Period.

The claims alleged against Defendant in the lawsuit and PAGA notice are failure to pay all straight time wages, failure to pay all overtime wages, failure to provide lawful meal periods, failure to provide lawful rest periods, failure to provide compliant wage statements, and failure to pay all wages due at termination. The PAGA Period is June 25, 2023, through September 21, 2025.

5. *How Much Can I Expect to Receive From This Settlement?*

The total maximum amount that Defendant is required to pay under the settlement is \$135,500 ("Gross Settlement Amount" or "GSA"). The "Net Settlement Amount" or "NSA" means the portion of the Gross Settlement Amount after the deduction of (1) the PAGA Representative Enhancement Payment to Plaintiff in an amount of \$2,500, for prosecution of the Action; (2) the Settlement Administration Costs to the Settlement Administrator in the amount of \$3,650; and (3) payment to Plaintiff's Counsel in the amount of \$40,650 (30% of the Gross Settlement Amount) for attorneys' fees and an amount of \$22,153 for litigation costs. All of these payments were approved by the Court.

After deducting the above-referenced items, the remaining Net Settlement Amount, will be divided 75% to the LWDA, pursuant to California Labor Code § 2699, subdivision (i), for enforcement of labor laws, including the administration of this part, and for education of employers and employees about their rights and responsibilities under this code, to be continuously appropriated to supplement and not supplant the funding to the agency for those purposes; and 25% to the Aggrieved Employees. Therefore, the LWDA will receive \$49,910.25 and \$16,636.75 is left for distribution to Aggrieved Employees.

Each Aggrieved Employee will receive a proportionate share of the NSA that is equal to (i) the number of pay periods he or she worked for Defendant in California during the PAGA Period based on the data provided by Defendant, divided by (ii) the total number of pay periods worked by all Aggrieved Employees based on the same data, which is then multiplied by the NSA. One day worked in a given pay period will be credited as a pay period for purposes of this calculation. Therefore, the value of each Aggrieved Employee's Individual Settlement Share ties directly to the amount of pay periods that he or she worked.

The check included with this notice represents your settlement share based on this formula. For purposes of computing taxes, one-hundred percent (100%) of the amount of money you received is considered to be a civil penalty and has not been subjected to tax withholding.

It is strongly recommended that upon receipt of your Individual Settlement Share check, you immediately cash it or cash it before the **180-day** void date shown on each check. Funds represented by settlement checks returned as undeliverable and those settlement checks remaining un-cashed for more than 180 days after issuance will be transmitted to California State Controller's Office Unclaimed Property Fund in the name of the Aggrieved Employee.

You will not be retaliated against for cashing the settlement check included with this notice.

6. *How Can I Obtain Additional Information or Court Documents?*

IF YOU NEED MORE INFORMATION OR HAVE ANY QUESTIONS, you may contact Plaintiff's Counsel listed above, or the Settlement Administrator at the telephone number listed below, toll free. Please refer to the Audi Fletcher Jones settlement.

PLEASE DO NOT CALL THE COURT OR COURT'S CLERK FOR INFORMATION ABOUT THIS SETTLEMENT.