

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
URIAH MOLLE, an individual; AMIN ASVADI, an individual, both on behalf of all similarly situated aggrieved employees,
2. Title of the proposed order:
[PROPOSED] ORDER GRANTING APPROVAL OF PAGA SETTLEMENT AND JUDGMENT
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Motion for Approval of Settlement of Private Attorneys General Act of 2004 ("PAGA") Claims
 - b. Date and time: May 21, 2026 @2:00 p.m.
 - c. Place: Orange County Superior Court, 751 W. Santa Ana Blvd., Santa Ana, CA 92701
4. The proposed order was served on the other parties in the case.

(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME:

Molle and Asvadi v. Clear Vision Financial, LLC dba Liberty1 Financial

CASE NUMBER:

30-2024-01433193-CU-OE-CXC

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):

5820 Oberlin Drive, Suite 205, San Diego, CA 92121

b. My electronic service address is (*specify*): jweber@keeganbaker.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):

Todd R. Wulffson, Esq., Alessandra Whipple, Esq., Hannah Hong, Esq.

Attorneys for Defendant CLEAR VISION FINANCIAL, LLC dba LIBERTY1 FINANCIAL

hhong@cdflaborlaw.com

b. To (*electronic service address of person served*): twulffson@cdflaborlaw.com, awhipple@cdflaborlaw.com

c. On (*date*): April 29, 2026

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: April 29, 2026

John J. Weber

(TYPE OR PRINT NAME OF DECLARANT)



/s/ John J. Weber

(SIGNATURE OF DECLARANT)

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF ORANGE**

10 URIAH MOLLE, an individual; AMIN
11 ASVADI, an individual, both on behalf of all
12 similarly situated aggrieved employees,

13 Plaintiff,

14 v.

15 CLEAR VISION FINANCIAL, LLC, d/b/a
16 LIBERTY1 FINANCIAL, a California limited
17 liability company; and DOES 1-50, inclusive,

18 Defendants.
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Case No: 30-2024-01433193-CU-OE-CXC

**[PROPOSED] ORDER GRANTING
APPROVAL OF PAGA SETTLEMENT
AND JUDGMENT**

Date: May 21, 2026

Time: 2:00 P.M.

Judge: Layne H. Melzer

Dept.: CX-102

Complaint Filed: October 15, 2024

20 Plaintiffs Uriah Molle and Amin Asvadi's ("Plaintiffs") Motion for Order (1) granting
21 approval of the proposed settlement of claims brought pursuant to the Private Attorneys General
22 Act of 2004 (Cal. Labor Code § 2698 *et seq.*) ("PAGA") set forth in the Parties' Amended and
23 Restated Settlement Agreement and Release of Private Attorneys General Act Claims (the
24 "Settlement" or "Settlement Agreement"), attached as Exhibit A to the Supplemental Declaration
25 of John J. Weber [ROA # 71]; (2) appointing Simpluris, Inc., ("Simpluris") as the Settlement
26 Administrator; (3) directing disbursement of the Gross Settlement Amount pursuant to the terms of
27 the Settlement Agreement; (4) directing payment of attorneys' fees and litigation costs from the
28 Gross Settlement Amount; and (5) directing enhancement payments from the Gross Settlement

1 Amount to Plaintiffs Molle and Asvadi, came on for hearing before this Court in Department CX-
2 102, the Honorable Layne H. Melzer presiding, on May 21, 2026. Appearances were noted on the
3 record.

4 Having reviewed the Settlement Agreement and duly considered the Parties' papers and oral
5 argument, and good cause appearing,

6 **THE COURT HEREBY ORDERS AS FOLLOWS:**

7 1. All terms used but not defined herein shall have the same meaning as defined in the
8 Settlement Agreement.

9 a. "PAGA Members" means: Any and all individuals who were employed by
10 Defendant in a non-exempt position for at least one Eligible Pay Period in
11 California during the PAGA Period.

12 b. "PAGA Period" means: The time period from August 11, 2023 through March
13 18, 2025.

14 2. This Court has jurisdiction over the claims of the PAGA Members and the State of
15 California asserted in this proceeding and over all parties to the Action.

16 3. The Court finds that the Settlement was entered into in good faith, that the
17 Settlement is fair, reasonable and adequate, and that the Settlement satisfies the standards and
18 applicable requirements for approval of PAGA representative actions under California law. The
19 Court finds that the Gross Settlement Amount of \$165,000 represents a fair compromise of the
20 claims alleged in the Action, considering the maximum potential value of the claims asserted and
21 the risks inherent in further litigation.

22 4. The Court has considered the authorities and evidence presented by Plaintiff and
23 based thereon hereby approves the following awards and deductions from the Gross Settlement
24 Amount:

25 a. To Plaintiff's Counsel, Keegan & Baker, LLP, an award of \$49,500 in
26 attorneys' fees and \$6,641.35 in reimbursement of litigation costs. The Court finds that
27 these amounts are fair and reasonable and commensurate with applicable California law.

28 b. To Plaintiffs Uriah Molle and Amin Asvadi, an enhancement payment of

1 \$5,000 each. The Court finds that both the time and effort that Plaintiffs Molle and Asvadi
2 spent on behalf of other PAGA Members and the State justifies this payment.

3 c. To Simpluris, Inc., the settlement administrator, a payment of \$3,500 to
4 administer the Settlement through its conclusion, including disbursement of the Gross
5 Settlement Amount and all tax reporting associated therewith.

6 5. The amount remaining of the Gross Settlement Amount following these deductions
7 is the PAGA Penalty Fund of \$95,358.65. The PAGA Penalty Fund shall be distributed 65% (or
8 \$61,983.12) to the Labor and Workforce Development Agency and 35% (or \$33,375.53) to the
9 PAGA Members.

10 6. The Court finds that the Settlement has been provided to the LWDA as required by
11 PAGA and Labor Code section 2699, subdivision (l)(2), in particular.

12 7. Upon entry of this Order, the Parties shall effectuate all terms of the Settlement
13 based on the provisions and timelines set forth in the Settlement Agreement.

14 8. A Final Accounting Hearing is set for March 25, 2027, at 2:00 p.m. in Department
15 CX-102. All supporting papers must be filed at least sixteen (16) court days before the Final
16 Accounting Hearing date.

17 9. The Court retains jurisdiction to enforce the Settlement Agreement pursuant to Code
18 of Civil Procedure § 664.6 and as otherwise allowed by law.

19 **IT IS SO ORDERED.**

20 Dated: _____
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22 Hon. Layne H. Melzer
23 JUDGE OF THE SUPERIOR COURT
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