

1 Kane Moon (SBN 249834)
 E-mail: kmoon@moonlawgroup.com
 2 Lilit Ter-Astvatsatryan (SBN 320389)
 E-mail: lilit@moonlawgroup.com
 3 Michael Citrin (SBN 335033)
 E-mail: mcitrin@moonlawgroup.com
 4 **MOON LAW GROUP, PC**
 725 S. Figueroa Street, Suite 3100
 5 Los Angeles, California 90017
 Telephone: (213) 232-3128
 6 Facsimile: (213) 232-3125

7 Attorneys for Plaintiff Sylvia Zamora

8
 9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

11 SYLVIA ZAMORA, individually, and on
 12 behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 CAPC, INC., a California corporation; and
 16 DOES 1 through 10, inclusive,

17 Defendants

Case No.: 24STCV24050

REPRESENTATIVE ACTION

~~PROPOSED~~ JUDGMENT

[Filed with (1) Plaintiff's Notice of Motion and Motion for Approval of PAGA Settlement, (2) the Declaration of Kane Moon, (3) the Declaration of Plaintiff, (4) the Declaration of Jodey Lawrence re: Qualifications and Costs for Settlement Administration, and (5) [Proposed] PAGA Approval Order]

PAGA APPROVAL HEARING:

Date: June 24, 2026

Time: 10:00 a.m.

Dept.: 9

Judge: Honorable Elaine Lu

Action filed: September 17, 2024

FAC filed: December 23, 2024

Trial date: Not set

~~**JUDGMENT**~~

Plaintiff Sylvia Zamora (“Plaintiff”) and Defendant CAPC, Inc. (“Defendant”) (collectively, Plaintiff and Defendant are the “Parties”) have reached a settlement of the above-captioned matter (the “Action”). Pursuant to the California Private Attorneys General Act of 2004, Labor Code sections 2698, *et seq.* (“PAGA”), Plaintiff has filed a Motion for Approval of PAGA Settlement (“Plaintiff’s Motion”) seeking approval of the Parties’ PAGA Settlement Agreement (the “Settlement”). A copy of the Settlement was attached as **Exhibit 1** to the Declaration of Kane Moon in Support of Plaintiff’s Motion for Approval of PAGA Settlement.

The Court, having duly considered Plaintiff’s Motion, the supporting declarations and exhibits thereto, including the Settlement, all other papers filed and proceedings had herein, and having reviewed the record in this Action, and good cause appearing, **HEREBY ADJUDGES AND DECREES AS FOLLOWS:**

1. The Court has granted Plaintiff’s Motion and the Parties’ Settlement by way of an Order Granting Motion for Approval of PAGA Settlement (the “PAGA Approval Order”). The PAGA Approval Order is incorporated herein in its entirety.

2. The Court now enters Judgment. The Judgment set forth herein is intended to be a final disposition of the Action in its entirety and is intended to be immediately appealable. All capitalized terms used for purposes of this Judgment have the same meaning as given in the Settlement, unless otherwise indicated.

3. In accordance with and for the reasons stated in the PAGA Approval Order, this Judgment is entered whereby Plaintiff, PAGA Counsel, the California Labor and Workforce Development Agency (the “LWDA”), and the Aggrieved Employees, shall take nothing from Defendant, except as expressly set forth in the PAGA Settlement.

4. Plaintiff has exhausted all administrative remedies required to bring the PAGA claims alleged in this Action and is authorized to act as a private attorney general with respect to the PAGA claims being released under the terms of the Settlement. Pursuant to Labor Code section 2699(s)(2), the LWDA was given notice of the Settlement and the hearing on Plaintiff’s Motion, has not objected, and is therefore bound by this Judgment.

5. The “Aggrieved Employees” are:

All non-exempt, hourly employees who worked for Defendant in California during the PAGA Period.

6. The “PAGA Period” means:

September 15, 2023, to March 11, 2026.

7. Releases of Claims:

a. Released PAGA Claims. Upon full funding of the Gross Settlement Amount, Plaintiff and the LWDA shall fully release and discharge Defendant and the Released Parties from any and all claims 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.

b. 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.

8. All payments due by Defendant for settlement of this Action will be made pursuant to the Settlement, the PAGA Approval Order, and this Judgment.

9. Each side is to bear its own costs and attorneys’ fees, except as provided by the Settlement, the PAGA Approval Order, or this Judgment.

10. Nothing in the Settlement, the PAGA Approval Order, or this Judgment will be construed as an admission or concession by any Party.

11. Based on entry of the PAGA Approval Order and this Judgment, and in accordance with the Settlement, this entire Action is DISMISSED WITH PREJUDICE, including dismissal with prejudice of the Released PAGA Claims on behalf of Plaintiff and all Aggrieved Employees.

12. Pursuant to California Code of Civil Procedure section 664.6 and notwithstanding entry of the PAGA Approval Order or this Judgment, the Court shall have continuing jurisdiction over the Action for purposes of: (1) enforcing the Settlement; (2) addressing settlement administration matters; and (3) addressing

such post-Judgment matters as may be appropriate under Court rules and applicable law.

JUDGMENT IS SO ENTERED.

Dated: 06/24/2026



Hon. Elaine Lu
Judge of the Superior Court, Los Angeles County