

Harris Emran (SBN 329674)
Kaitlin Martinez (SBN 348006)
EMRAN LAW FIRM
415 Mission Street, 37th Floor
San Francisco, California 94105
Office: (415) 890-0041
Email: Harris@Emranlaw.com
Kaitlin@Emranlaw.com

Attorneys for Plaintiff,
Ana Arechiga,

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF VENTURA

ANA ARECHIGA, an individual, and in her
representative capacity on behalf of the State of
California and other Aggrieved Employees,

Plaintiff,

v.

PARTNERS IN CARE HOME CARE INC., a
California Corporation; ANYSA M SOLIS, an
individual; and DOES 1-15

Defendants.

Case No: 2024CUOE034726

**[PROPOSED] JUDGMENT APPROVING
PAGA SETTLEMENT**

Complaint Filed: December 18, 2024

Hearing Date: October 28, 2025

Time: 8:30 a.m.

Dept: 20

Hon. Maureen M. Houska

Plaintiff Ana Arechiga's unopposed Motion for Approval of California Labor Code Private Attorneys General Act of 2004 ("PAGA") Settlement ("Motion") in the above-captioned action, having come before the Court for a hearing on the date indicated above, and the Court being duly apprised of the premises, and good cause appearing, therefore,

IT IS HEREBY ORDERED, AJUDICATED, and DECREED THAT:

1. Plaintiff's Motion for Approval of California Labor Code Private Attorneys General Act of 2004 ("PAGA") Settlement is **GRANTED**, and the settlement of this action is hereby **APPROVED**.

1 2. Capitalized terms in this Approval Order shall have the same meaning they are given
2 in the PAGA Settlement Agreement attached as Exhibit C to the Declaration of Harris Emran filed
3 in support of the Motion;

4 3. Phoenix Class Action Administration Solutions is approved to serve as the
5 Settlement Administrator and is hereby authorized to perform all of the duties assigned to it in the
6 Settlement Agreement and to disburse the following from the Gross Settlement Amount in
7 accordance with the terms of the PAGA Settlement and Release:

- 8 a. Plaintiff's Individual Settlement Payment to Plaintiff of Sixty-Five Thousand
9 Dollars and Zero Cents (\$65,000.00) (in addition to any Individual PAGA
10 Payment Plaintiff is entitled to receive as an Aggrieved Employee).
- 11 b. Attorneys' fees and costs to Plaintiff's Counsel for prosecution of the PAGA
12 Claim in the amount of Seven Thousand Dollars and Zero Cents (\$7,000.00) for
13 attorneys' fees and up to Five Thousand Dollars and Zero Cents (\$5,000.00), for
14 the costs incurred in this matter. Plaintiff's Counsel is directed to submit their
15 final costs to the Settlement Administrator after receipt of this order approving
16 the PAGA Settlement and Phoenix is directed to only reimburse the actual costs
17 incurred;
- 18 c. Settlement Administration Costs in the amount of Two Thousand Five Hundred
19 Dollars and Zero Cents (\$2,500.00) for administration of this Settlement;
- 20 d. The remaining Net Settlement Amount ("PAGA Penalties"), estimated to be at
21 least Five Thousand Five Hundred Dollars and Zero Cents (\$5,500.00), as
22 payment to the LWDA and the Aggrieved Employees with sixty-five percent
23 (65%), estimated to be at least Three Thousand Five Hundred Seventy-Five
24 Dollars and Zero Cents (\$3,575.00) of the Net Settlement Amount shall be
25 distributed to the LWDA ("LWDA PAGA Payment") and the remaining thirty-
26 five percent (35%), estimated to be at least One Thousand Nine Hundred
27 Twenty-Five Dollars and Zero Cents (\$1,925.00) shall be distributed to the
28 PAGA Settlement Members ("Individual PAGA Payment").

4. The State of California and all Aggrieved Employees (including Plaintiff) are hereby deemed to have, and by operation of this Approval Order and Judgment shall have, expressly released, waived, and discharged Defendants and each and all of the Released Parties from the Released PAGA Claims, including, demands, liabilities, damages, attorneys' fees, costs and penalties that could have been recovered and they shall be bound by this Approval Order and Judgment and be forever barred from suing the Released Parties on any of the Released PAGA Claims;

5. Judgment shall be entered forthwith in accordance with the foregoing, with each side to pay his or its own attorneys' fees and costs except as expressly set forth in the PAGA Settlement Agreement;

6. Plaintiff shall give notice of this Judgment to the Labor and Workforce Development Agency within ten (10) days after entry of the Judgment or order pursuant to California Labor Code section 2699(1)(3); and

7. The Court retains exclusive and continuing jurisdiction over this Action for purposes of supervising, administering, implementing, interpreting, and enforcing this Order and Judgment, as well as the Settlement.

LET JUDGMENT BE FORTHWITH ENTERED ACCORDINGLY. IT IS SO ORDERED.

Dated:

HONORABLE MAUREEN M. HOUSKA
JUDGE OF THE SUPERIOR COURT