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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN**

BRENNA SHATSWELL, as a private attorney
general.

Plaintiff,

vs.

SENIOR DOC MANAGEMENT, LLC, a
California limited liability company; GEISS MED
MANAGEMENT, LLC, a California limited
liability company; J.M. GEISS, D.O., APC, a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. BCV-25-100270

[Hon. Bernard C. Barmann, Jr.]

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

Date: August 28, 2026
Time: 8:30 a.m.
Location: Division H

Complaint Filed: January 24, 2025
FAC Filed: June 9, 2025
SAC Filed: April 13, 2026

1 The motion for an Order Granting Approval of PAGA Settlement was filed by Plaintiff, Brenna
2 Shatswell, on July 24, 2026, and a hearing was held before this Court on August 28, 2026.

3 After considering the papers and evidence, arguments of counsel, and all other matters presented
4 to the Court, and having taken the matter under submission, **IT IS HEREBY ORDERED AND**
5 **ADJUDGED** as follows:

6 1. The motion for approval of the Labor Code Private Attorneys General Act of 2004
7 (“PAGA”) settlement is granted. Plaintiff has fairly and adequately protected the interests of the State,
8 and Plaintiff’s Counsel are qualified to serve as counsel for the Plaintiff in her representative capacity.
9 The Joint Stipulation of PAGA Settlement (the “Agreement”) submitted by the Parties appears to be fair,
10 adequate, and reasonable in light of PAGA’s policies and in furtherance of PAGA’s purposes.

11 2. The Parties are hereby ordered to carry out the terms of the Agreement.

12 3. Within 14 days, Defendants Senior Doc Management, LLC f/k/a Geiss Med Management
13 LLC and J.M. Geiss, D.O., APC is hereby ordered to deposit the \$125,000.00 Settlement Amount with
14 Phoenix Settlement Administrators (the “Administrator”).

15 4. Within seven days after receipt of the Settlement Amount, the Administrator shall
16 distribute the Settlement Amount as follows:

- 17 • \$41,666.67 as Attorneys’ Fees to Plaintiff’s Counsel;
- 18 • \$2,200.51 as Costs to Plaintiff’s Counsel;
- 19 • \$4,000.00 as Administration Costs to the Administrator;
- 20 • \$10,000.00 as a General Release Payment to Plaintiff;
- 21 • \$43,636.33 as PAGA Penalties to the Labor and Workforce Development Agency; and
- 22 • \$23,496.49 as PAGA Penalties to PAGA Settlement Members based on the number of
23 relevant pay periods worked by each PAGA Settlement Member.

24 5. The Court grants approval of the settlement in accordance with the terms of the
25 Agreement and this Order.

26 6. The Court hereby enters Final Judgment. Without affecting the finality of the Order and
27 Final Judgment filed herewith, the Court reserves continuing jurisdiction over the Action, Plaintiff, and
28 Defendants for the purposes of (i) the interpretation and enforcement of the terms of the settlement, (ii)

1 settlement administration matters, and (iii) post-Judgment matters as may be appropriate under Court
2 rules or as set forth in the Agreement.

3 7. Except as otherwise provided in the Agreement, the Parties are to bear their own costs
4 and attorneys' fees.

5 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

6 DATED: _____, 2026

7 HON. BERNARD C. BARMANN, JR.
8 JUDGE OF THE SUPERIOR COURT
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