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Attorneys for LOGIX EMPLOYMENT SERVICES, INC., a California corporation; LFCU
FINANCIAL SERVICES, LLC, a California corporation

**SUPERIOR COURT OF CALIFORNIA FOR THE
COUNTY OF LOS ANGELES- CENTRAL DISTRICT**

NATALIE WORSHAM, an individual,

Plaintiff,

vs.

LOGIX EMPLOYMENT SERVICES,
INC., a California corporation; LFCU
FINANCIAL SERVICES, LLC, a
California corporation; and, DOES 1-100,
inclusive,

Defendant(s).

Case No. 25STCV08354

**STIPULATION FOR AN ORDER
APPROVING RELEASE AND DISMISSAL
WITHOUT PREJUDICE OF PLAINTIFF'S
CLAIM FOR WAGES, PENALTIES AND
INTEREST PURSUANT TO THE PRIVATE
ATTORNEY'S GENERAL ACT ("PAGA");
[PROPOSED] ORDER THEREON**

**Judge: Hon. Doreen B. Boxer
Dept. 19**

**Complaint Filed: March 21, 2025
Trial Date: April 20, 2026**

1 **STIPULATION FOR SETTLEMENT AND DISMISSAL OF PAGA**

2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that the Parties, by and through their respective counsel of
4 record, Peggy A. Farrell, attorney for Plaintiff NATALIE WORSHAM (“Plaintiff”); Brian E.
5 Koegle, Lucas E. Rowe and Caleb A. Miller of the Koegle Law Group, APC, attorneys for
6 Defendant LOGIX EMPLOYMENT SERVICES, INC., a California corporation; LFCU
7 FINANCIAL SERVICES, LLC, a California corporation (“Defendants”); and hereby stipulate and
8 jointly apply for an Order from the Court approving the release and dismissal without prejudice of
9 Plaintiff’s claim for Wages, Penalties and Interest Pursuant to the California Attorney General’s
10 Act of 2004 [Labor Code §§ 2699, *et seq.*] (24th Cause of Action to Complaint) (“PAGA Claim”).

11 **STIPULATION**

12 1. WHEREAS, on August 5, 2019, Plaintiff filed suit against Defendants alleging
13 sixteen (16) causes of action for discrimination based on disability Cal. Gov’t Code § 12940(a),
14 failure to accommodate (Cal. Gov’t Code § 12940(m), failure to enter into a good faith process,
15 (Cal. Gov’t Code § 12940(n)), retaliation for requesting reasonable accommodations (Cal. Gov’t
16 Code § 12940(m)(2)) retaliation for opposing discrimination (Cal. Gov’t Code § 12940(h);
17 adoption/enforcement of unlawful policies (Cal. Labor Code §§ 1102.5(a)/ 232.5(a), retaliation
18 for engaging in protected activities, refusal to participate in unlawful activities (Cal. Labor Code
19 §§ 1102.5(b)-(c) and 98.6), retaliation for disclosing working conditions (Cal. Labor Code §
20 232.5(c)); failure to immediately pay all wages due at the time of termination (Cal. Labor Code §
21 201(a)); failure to timely make payroll (Cal. Labor Code § 204(a)-(b)); penalties pursuant to the
22 PAGA (Labor Code §§ 2698, *et seq.*) based on predicate violations of Cal. Labor Code §§ 98.6,
23 201(a), 204(a)-(b), 232.5, 1102.5(a)-(c); unfair business practices in violation of Cal. Bus. & Prof.
24 Code §§ 17200, *et seq.*; and wrongful termination in violation of public policy.

25 2. WHEREAS, Defendants deny these allegations in their entirety and deny any
26 liability whatsoever to Plaintiff or any other individual.

27 3. WHEREAS, on Thursday, January 8, 2026, the Parties participated in a private
28 mediation with Lou Peterson who assisted the Parties in reaching a confidential agreement to
resolve the Action in full (“Confidential Settlement”).

 4. WHEREAS, the Parties reached the Confidential Settlement solely on the basis of

1 Plaintiff's individual, non-PAGA claims and did not allocate any portion of the confidential
2 settlement proceeds to the PAGA Claim on the grounds that (1) no PAGA discovery was
3 conducted and therefore there was no identifiable representative group of similarly aggrieved
4 employees; (2) nor were any facts or theories related to the PAGA Claim were proffered in
5 conjunction with or in consideration of reaching the Confidential Settlement; (3) the Action is
6 primarily based on Plaintiff's FEHA Claims for disability discrimination and failure to
7 accommodate and associated claims for emotional distress damages, punitive damages, and
8 statutory attorney's fees. Further, Plaintiff acknowledges that it is unlikely that Plaintiff would
9 recover PAGA penalties for the Labor Code claims plead.

10 5. WHEREAS, because no part of the settlement payment under the Settlement terms
11 is allocated to the PAGA Claim, for the reasons stated above, Plaintiff requests that the Court
12 release and dismiss, without prejudice, her claim for Wages, Penalties and Interest Pursuant to
13 PAGA (14th Cause of Action). Plaintiff will file a second dismissal with respect to her individual
14 claims, with prejudice.

15 6. Based on the foregoing, the Parties hereby request a Court order approving the
16 release and dismissal of the PAGA Claim in the manner set forth above.

17 **SO STIPULATED.**

18 Dated: January 12, 2026

LAW OFFICE OF PEGGY A. FARRELL ^{APC}

19 Signed: 

Peggy A. Farrell

Attorney for Plaintiff NATALIE WORSHAM

20 Dated: January 15, 2026

KOEGLE LAW GROUP ^{APC}

21 Signed: 

Lucas Rowe

Attorney for Defendants

1 **[PROPOSED] ORDER**

2 Good Cause being hereby shown, the Court hereby orders the release and dismissal
3 without prejudice of Plaintiff's 14th Cause of Action for Wages, Penalties and Interest Pursuant
4 to the California Attorney General's Act of 2004 [Labor Code §§ 2699, *et seq.*].

5 **IT IS SO ORDERED.**

6
7 Dated: _____

Signed: _____

8 Hon. Judge Doreen B. Boxer
9 Judge of the Los Angeles Superior Court

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PROOF OF SERVICE

Worsham v. Logix Employment Services Inc., et al.
LASC Case No. 25STCV08354

I, the undersigned, am over the age of eighteen years and am resident of Los Angeles County, California; I am not a party to the above-entitled action; my business mailing address is 2658 Griffith Park Blvd., #114, Los Angeles, CA 90039.

On January 15, 2026, I served the following document(s):

**STIPULATION FOR AN ORDER APPROVING RELEASE AND DISMISSAL
WITHOUT PREJUDICE OF PLAINTIFF'S CLAIM FOR WAGES, PENALTIES AND
INTEREST PURSUANT TO THE PRIVATE ATTORNEY'S GENERAL ACT ("PAGA")
[PROPOSED] ORDER THEREON**

X BY EMAIL: In accordance with CCP § 1010.6(e), I caused the document(s) identified above to be served via email as follows:

Brian Koegle
bkoegle@koeglelaw.com
Lucas E. Rowe
lrowe@koeglelaw.com
Caleb A. Miller
cmiller@koeglelaw.com
Ransom Boynton
rboynton@koeglelaw.com
Koegle Law Group, APC
27240 Turnberry Ln, Ste 200
Valencia, CA 91355

Executed on January 15, 2026 from Los Angeles, California.

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



Peggy A. Farrell

PROOF OF SERVICE