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Attorneys for Plaintiff PASHA KRAFT

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SONOMA

PASHA KRAFT, an individual, on behalf of
the State of California, as a private attorney
general,

Plaintiff,

v.

THE LAGUNITAS BREWING COMPANY,
a California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No.: SCV-272762

**[PROPOSED] ORDER APPROVING
PAGA SETTLEMENT AND JUDGMENT**

Hearing Date: To Be Set By Court

Hearing Time: To Be Set By Court

Judge: Hon. Patrick Broderick
Dept.: 16

1 Plaintiff Pasha Kraft (“Plaintiff”) with Defendant The Lagunitas Brewing Company
2 (“Defendant”) moved for approval of the proposed settlement of Plaintiff’s claims for civil
3 penalties under the California Labor Code Private Attorneys General Act (“PAGA”), pursuant to
4 California Labor Code section 2699(l). Plaintiff seeks approval of the settlement, including the
5 Gross Settlement Amount (“GSA”) of \$220,000.00. The Joint Stipulation of Settlement of PAGA
6 Action and Release of PAGA Claims (the “Settlement Agreement”) provides that the PAGA
7 Payment of \$120,166.67 shall be paid from the \$220,000.00 GSA. The Settlement Agreement also
8 provides that (1) \$73,333.33 be paid to PAGA Counsel for payment of attorneys’ fees; (2) PAGA
9 Counsel’s actual litigation costs incurred be paid to PAGA Counsel, \$20,000.00; and (3) \$6,500.00
10 be paid to the Settlement Administrator for the cost of administration of the settlement. The Labor
11 Workforce Development Agency (“LWDA”) was provided with notice of the settlement and the
12 motion via its online process and no objection has been received to the settlement or the motion.

13 Upon entry of final judgment and funding of the Gross Settlement Amount in full, Plaintiff,
14 the LWDA and the State of California shall release the Released PAGA Claims against Defendant,
15 and its former and present parents, subsidiaries, and affiliates, and their officers, directors, owners,
16 executives, partners, employees, shareholders, agents, and any other successors, assigns, or legal
17 representatives (“Released Parties”). The Released PAGA Claims are all PAGA claims that
18 occurred within the PAGA Period that were alleged, or that could have been alleged based on the
19 facts asserted, in the operative PAGA complaint and/or Plaintiff Kraft’s PAGA Notice to the
20 LWDA, and expressly excluding all other claims, including claims for vested benefits, wrongful
21 termination, unemployment insurance, disability, social security, workers’ compensation, and
22 PAGA claims outside of the PAGA Period. Released PAGA Claims include, but are not limited
23 to, claims for PAGA penalties arising from alleged violations of California Labor Code §§ 201,
24 202, 203, 221, 226, 226.7, 351, 510, 512, 1194, 1197, and 1197.1.

25 Good cause appearing based on the reasons set forth in the motion for approval, the
26 Court hereby GRANTS the motion and approves the PAGA settlement as set forth in the Settlement
27 Agreement and the PAGA Payment of \$120,166.67, which shall be allocated and paid out as set
28 forth in the Settlement and in accordance with Labor Code section 2699(i).

1 After entry of this Judgment, the Court shall retain jurisdiction to construe, interpret,
2 implement, and enforce the Settlement Agreement, to hear and resolve any contested challenge to
3 a claim for settlement benefits, and to supervise and adjudicate any dispute arising from or in
4 connection with the distribution of settlement benefits.

5
6 **IT IS SO ORDERED AND ADJUDGED, LET JUDGMENT BE FORTHWITH**
7 **ENTERED ACCORDINGLY.**

8
9 DATED: _____

10 _____
HON. PATRICK BRODERICK