

Electronically Received 01/31/2025 02:24 PM

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9 Attorneys for Plaintiff,
10 JORGE PEREZ,
and all putative class members

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**

14 JORGE PEREZ, on behalf of himself and others
15 similarly situated,

16 Plaintiff,

17 vs.

18 QUAIL LODGE, INC., a California Corporation,
and DOES 1-50, inclusive,

19 Defendant.
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22 JORGE PEREZ, an individual, on behalf of
himself, all aggrieved employees, and the State
23 of California as a Private Attorneys General,

24 Plaintiff,

25 vs.

26 QUAIL LODGE, INC., a California Corporation,
and DOES 1-50, inclusive,

27 Defendant.
28

FILED
Superior Court of California
County of Los Angeles

02/10/2025

David W. Slayton, Executive Officer / Clerk of Court

By: I. Arellanes Deputy

Case No: 22STCV22540 (Lead Case)
Consolidated with Case No.: 22STCV00572

**AMENDED ~~PROPOSED~~ ORDER
GRANTING FINAL APPROVAL TO
CLASS ACTION SETTLEMENT AND
APPLICATION FOR CLASS COUNSEL
FEES, CLASS COUNSEL COSTS, CLASS
REPRESENTATIVE ENHANCEMENT,
AND FINAL JUDGMENT THEREON**

Case No.: 22STCV00572

1 Settlement Amount) be paid to Koul Law Firm, APC, and Law Offices of Sahag Majarian, II, out
2 of the Gross Settlement Amount.

3 10. The Court also finds and determines that the request by Class Counsel for Class
4 Counsel Expenses is fair and reasonable and hereby orders that \$15,000 be paid to Koul Law Firm,
5 APC, and Law Offices of Sahag Majarian, II, out of the Gross Settlement Amount.

6 11. The Court also finds and determines that the PAGA Penalty Payment in the amount
7 of \$37,500 (75% of the PAGA Penalty) to the LWDA is fair and reasonable and hereby orders that
8 amount to be paid to the LWDA out of the Gross Settlement Amount.

9 12. Upon entry of this Final Approval Order and funding of the Gross Settlement
10 Amount, as well as employer-side taxes, the Settlement Class Members will forever completely
11 release and discharge the Released Parties from the Released Class Claims for the Class Release
12 Period.

13 13. Upon entry of this Final Approval Order and funding of the Gross Settlement
14 Amount, as well as employer side taxes, Plaintiff, the Labor Commissioner/LWDA on behalf of
15 the State of California, and all PAGA Aggrieved Employees will forever completely release and
16 discharge the Released Parties from the Released PAGA Claims through the PAGA Release Period.

17 14. Pursuant to the terms of the Settlement, Plaintiff makes an additional general release
18 as defined in the Settlement. Plaintiff expressly waives and relinquishes all rights and benefits
19 afforded by Section 1542 which states:

20 **A general release does not extend to claims which the creditor or releasing**
21 **party does not know or suspect to exist in his or her favor at the time of**
22 **executing the release and that, if known by him or her, would have materially**
23 **affected his or her settlement with the debtor or released party.**

24 15. Nothing in this Order shall preclude any action to enforce the Parties' obligations
25 under the Settlement or under this Order, including the requirement that Defendant make payment
26 in accordance with the Settlement.

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23. The Court sets a final accounting hearing for November 7, 2025, at 4:00 PM. The Parties are ordered to file a Declaration Re: Distribution by November 5,2025.

IT IS SO ORDERED AND ADJUDICATED.

DATED: 02/10/2025



A handwritten signature in black ink, appearing to read "K. Freeman", written over a horizontal line.

Honorable Kenneth Freeman
Kenneth R. Freeman / Judge
Judge of the Superior Court

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PROOF OF SERVICE

Case No. 22STCV22540

Perez v. Quail Lodge, Inc., et al.

I, NADIA CHAVEZ declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the entitled case. The name and address of my residence or business is KOUL LAW FIRM, 217 South Kenwood Street, Glendale, California 91205.

On January 31, 2025, I served the foregoing document described as:

- 1. STIPULATION TO CONSOLIDATE RELATED CASES FOR ALL PURPOSES: 22STCV22540 AND 22STCV00572; [PROPOSED] ORDER THERON;**
- 2. AMENDED [PROPOSED] ORDER GRANTING FINAL APPROVAL TO CLASS ACTION SETTLEMENT AND APPLICATION FOR CLASS COUNSEL FEES, CLASS COUNSEL COSTS, CLASS REPRESENTATIVE ENHANCEMENT, AND FINAL JUDGEMENT**

X **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed before via third-part service CASEANYWHERE.

Marlene S. Muraco, Esq.
LITTLER MENDELSON, P.C.
 50 W. San Fernando, 7th Floor
 San Jose, CA 95113
 mmuraco@littler.com

Attorneys for Defendant QUAIL LODGE, INC.

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

Executed on this January 31, 2025, in Glendale, California.



 NADIA CHAVEZ