Nazo Koulloukian, SBN 263809

On January 30, 2025, a hearing was held on Plaintiff JORGE PEREZ's unopposed Motion for Final Approval of the Class Action Settlement and Motion for Class Counsel Fees, Class Counsel Costs, and Class Representative Enhancement.

The Parties have submitted their Class Action and PAGA Settlement Agreement and Class Notice ("Settlement"), which this Court preliminarily approved on February 15, 2024 (the "Preliminary Approval Order"). Under the Preliminary Approval Order, Class Members have been given adequate notice of the terms of the Settlement and the opportunity to object to it or to exclude themselves from it.

Having received and considered the Settlement, the supporting papers filed by the Parties, and the evidence and argument received by the Court before entering the Preliminary Approval Order and at the Final Approval Hearing, the Court grants final approval of the Settlement, enters this Final Approval Order and Judgment, and HEREBY ORDERS and MAKES DETERMINATIONS as follows:

- Except as otherwise specified herein, the Court for purposes of this Final Approval
 Order and Judgment adopts all defined terms set forth in the Settlement.
- 2. For settlement purposes only, the Court grants certification of the Class. The Class is defined as Plaintiff and all current and former hourly, non-exempt employees of Defendant in California, at any time from July 13, 2018, until February 15, 2024.
- 3. Pursuant to the Preliminary Approval Order, the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval ("Class Notice") was sent to each Class Member on August 14, 2024, by first-class mail in both English and Spanish. The Class Notice informed Class Members of the terms of the Settlement, their right to receive an Individual Settlement Payment, their right to comment on or object to the Settlement and/or the attorneys' fees and costs, their right to elect not to participate in the Settlement and pursue their own remedies, their right to appear in person and/or by counsel at the Final Approval Hearing and be heard regarding approval of the Settlement, and of other actions pending against Defendant. Adequate periods of time were provided by each of these procedures.

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protections to Class Members and provides the basis for the Court to make an informed decision regarding approval of the Settlement based on the responses of Class Members. The Court finds and determines that the notice provided in this case was the best notice practicable, which satisfied the requirements of law and due process.

5. For the reasons stated in the Preliminary Approval Order, the Court finds and

The Court finds and determines that this notice procedure afforded adequate

- 5. For the reasons stated in the Preliminary Approval Order, the Court finds and determines that the terms of the Settlement are fair, reasonable, and adequate to the Class and to each Class Member and that the Settlement Class Members will be bound by the Settlement, that the Settlement is ordered finally approved, and that all terms and provisions of the Settlement should be and hereby are ordered to be consummated.
- 6. The Court finds and determines that the all-inclusive Gross Settlement Amount in the amount of \$650,000.00 and the Individual Settlement Payments to be paid to the Settlement Class Members under the Settlement are fair and reasonable. The Court hereby grants final approval to and orders the payment of those amounts to be distributed to the Settlement Class Members out of the Net Settlement Amount in accordance with the Settlement. Pursuant to the terms of the Settlement, the Settlement Administrator is directed to make the payments to each Participating Class Member.
- 7. The Court finds and determines that the Settlement Administration Cost for the Settlement in the amount of \$12,000 is fair and reasonable. The Court hereby grants final approval to and orders that the payment of that amount be paid out of the Gross Settlement Amount to the Settlement Administrator in accordance with the Settlement.
- 8. The Court finds and determines that the request by Plaintiff JORGE PEREZ for a Class Representative Enhancement is fair and reasonable and hereby orders that the requested payment in the amount of \$10,000 be paid to Plaintiff out of the Gross Settlement Amount.
- 9. The Court further finds and determines that the request by Class Counsel for the Class Counsel Fee is fair and reasonable and hereby orders that \$216,666 (33.33% of the Gross

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

- 10. The Court also finds and determines that the request by Class Counsel for Class Counsel Expenses is fair and reasonable and hereby orders that \$15,000 be paid to Koul Law Firm, APC, and Law Offices of Sahag Majarian, II, out of the Gross Settlement Amount.
- 11. The Court also finds and determines that the PAGA Penalty Payment in the amount of \$37,500 (75% of the PAGA Penalty) to the LWDA is fair and reasonable and hereby orders that amount to be paid to the LWDA out of the Gross Settlement Amount.
- 12. Upon entry of this Final Approval Order and funding of the Gross Settlement Amount, as well as employer-side taxes, the Settlement Class Members will forever completely release and discharge the Released Parties from the Released Class Claims for the Class Release Period.
- 13. Upon entry of this Final Approval Order and funding of the Gross Settlement Amount, as well as employer side taxes, Plaintiff, the Labor Commissioner/LWDA on behalf of the State of California, and all PAGA Aggrieved Employees will forever completely release and discharge the Released Parties from the Released PAGA Claims through the PAGA Release Period.
- 14. Pursuant to the terms of the Settlement, Plaintiff makes an additional general release as defined in the Settlement. Plaintiff expressly waives and relinquishes all rights and benefits afforded by Section 1542 which states:

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

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

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- 17. The Parties entered into the Settlement solely for the purpose of compromising and settling disputed claims. Defendant in no way admits any violation of law or any liability whatsoever to Plaintiff and the Class, individually or collectively, all such liability being expressly denied by Defendant.
- All uncashed settlement checks will be delivered to the California State Controller's 18. Unclaimed Property Division in the name of the Class Member leaving no unpaid residues subject to the requirements of California Code of Civil Procedure Section 384(b).
- 19. By means of this Final Approval Order, this Court hereby enters final judgment in this Action.
- 20. Without affecting the finality of this Final Approval Order and Judgment in any way, pursuant to California Rules of Court, 3.769(h), the Court retains jurisdiction of all matters relating to the interpretation, administration, implementation, effectuation and enforcement of this Order, Judgment and the Settlement under Code of Civil Procedure § 664.6.
 - 21. The Parties are hereby ordered to comply with the terms of the Agreement.
- 22. Each side is to bear its own costs and attorneys' fees except as provided by the Settlement and this Final Approval Order and Judgment.

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1	23. The Court sets a final accounting hearing for November 7, 2025, at 4:00 PM. The
2	Parties are ordered to file a Declaration Re: Distribution by November 5,2025.
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4	IT IS SO ORDERED AND ADJUDICATED.
5	ELHORU COLLEGE
6	DATED: 02/10/2025
7	Honorable Kenneth Freeman Kenneth R. Freeman/Judge
8	Judge of the Superior Court
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1	PROOF OF SERVICE
2	Case No. 22STCV22540
3	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
4	address of my residence or business is KOUL LAW FIRM, 217 South Kenwood Street, Glendale, California 91205.
5	On January 31, 2025, I served the foregoing document described as:
6 7	1. STIPULATION TO CONSOLIDATE RELATED CASES FOR ALL PURPOSES: 22STCV22540 AND 22STCV00572; [PROPOSED] ORDER THERON;
8	2. AMENDED [PROPOSED] ORDER GRANTING FINAL APPROVAL TO CLASS
9 10	ACTION SETTLEMENT AND APPLICATION FOR CLASS COUNSEL FEES, CLASS COUNSEL COSTS, CLASS REPRESENTATIVE ENHANCEMENT, AND FINAL JUDGEMENT
11	X BY ELECTRONIC SERVICE: Based on a court order or an agreement of the
12	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
13	CASEANYWHERE.
1415	Marlene S. Muraco, Esq. LITTLER MENDELSON, P.C. 50 W. San Fernando, 7 th Floor San Jose, CA 95113
16	mmuraco@littler.com
17	Attorneys for Defendant QUAIL LODGE, INC.
18	I declare under penalty of perjury under the laws of the State of California that the foregoing
19	is true and correct.
20	Executed on this January 31, 2025, in Glendale, California.
21	Madin (haver)
22	NADIA CHAVEZ
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