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10 Attorneys for Plaintiff  
11 TINA PATEL

12 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES

14 TINA PATEL, in her representative capacity,  
15 Plaintiff,

16 vs.

17 ONEWEST RESOURCES, LLC, and Does 1-50,  
18 inclusive,  
19 Defendant.

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

MAR 16 2018

Sherri R. Carter, Executive Officer/Clerk  
By: Rexanna Arraiga, Deputy

Case No. BC653645

Assigned to Hon. Maren E. Nelson

**CLASS ACTION**

**STIPULATED JUDGMENT**

20 Plaintiff's Motion for Final Approval of Class Action Settlement, as well as Plaintiff's  
21 Motion for Attorneys' Fees and Costs and an Enhancement Award, were heard on March 9, 2018,  
22 before the Honorable Maren E. Nelson, Judge of the Superior Court of the State of California,  
23 County of Los Angeles, in Department 307 ("the Court"). The Court granted Plaintiff's Motions  
24 in a written order on March 9, 2018. Consistent with its Orders granting these Motions, the Court  
25 hereby enters the following stipulated judgment:

26 1. Certification of Class: Based on the Court's Order Granting Final Approval, the  
27 Class certified by the Court in its Preliminary Approval Order is appropriate and shall remain  
28 certified. The Class Definition is "all persons who were employed in non-exempt non-branch  
positions for Defendant in California at any time during the period from September 18, 2014,

1 through December 31, 2015.” The Class Period is the period from September 18, 2011 through  
2 the date of preliminary approval of this Settlement.

3       2.     Final Approval of Settlement: Consistent with the Court’s Order Granting Final  
4 Approval, the Settlement Agreement and the terms thereof, including the plan of allocation, the class  
5 notice provisions, and the releases, is finally approved by the Court as a fair and reasonable resolution of  
6 the dispute that is in the best interest of all Class members and pursuant to the Private Attorneys General  
7 Act. The released claims are “all claims, rights, demands, liabilities, and causes of action, of every nature  
8 and description, arising during the Class Period, whether known or unknown, that were or could have been  
9 brought based on the same set of operative facts as those set forth in the Action (via the complaint attached  
10 as Exhibit B) or the September 18, 2015 complaint in the Prior Action, to the date the Court grants  
11 preliminary approval of the settlement. The claims released by the Participating Class Members include,  
12 but are not limited to, statutory, constitutional, contractual or common law claims for wages, damages,  
13 unpaid costs or expenses, penalties, liquidated damages, punitive damages, interest, attorneys’ fees,  
14 litigation costs, restitution, or equitable relief, arising out of or based upon the following categories of  
15 allegations regardless of the forum in which they may be brought, to the fullest extent such claims are  
16 releasable by law: (i) all claims for unpaid overtime; (ii) all claims for meal break violations; (iii) all claims  
17 for unpaid minimum wages; (iv) all claims for the failure to timely pay wages upon termination; (v) all  
18 claims for the failure to timely pay wages during employment; (vi) all claims for wage statement  
19 violations; and (vii) all other penalties recoverable for such claims under PAGA. As to the foregoing  
20 Released Claims, specifically the causes of action alleged in the complaints in the action, this release also  
21 includes a waiver of unknown claims in accordance with the provisions of California Civil Code § 1542,  
22 which provides: “A general release does not extend to claims which the creditor does not know or suspect  
23 to exist in his or her favor at the time of executing the release, which if known by him or her must have  
24 materially affected his or her settlement with the debtor.” Pursuant to the parties October 25, 2017  
25 stipulation and the Court’s Preliminary Approval Order, the term “complaints” in the sentence “As to the  
26 foregoing Released Claims, specifically the causes of action alleged in the complaints in the action,”  
27 means the complaints filed in Case Nos. BC653645 and BC595033 only.



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SEYFARTH SHAW LLP

Dated: March 13, 2018

By: 

Brian P. Long  
Simon L. Yang

Attorneys for Defendant One West Resources LLC

**IT IS SO ORDERED.**

DATED: **MAR 16 2018**

MAREN E. NELSON

Hon. Maren E. Nelson  
Judge of the Superior Court