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16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

18 SILVA AVOYAN, as an individual and on
19 behalf of all others similarly situated,

20 Plaintiffs,

21 v.

22 SYNERGY HEMATOLOGY-
23 ONCOLOGY MEDICAL ASSOCIATES,
24 INC., a California corporation; and DOES
25 1 through 50, inclusive,

26 Defendants.

CASE NO. BC697578

[Assigned for all purposes to the Hon. Ann I.
Jones, Dept. 11]

[PROPOSED] JUDGMENT

Date: November 16, 2020
Time: 1:30 p.m.
Dept.: 11

Complaint Filed: March 9, 2018

FILED
Superior Court of California
County of Los Angeles

DEC 01 2020

Sherri R. Carter, Executive Officer/Clerk of Court
By *Dejane Wortham*, Deputy

1 On November 16, 2020, this Court granted final approval to the terms of Plaintiff Silva
2 Avoyan and Defendant Synergy Hematology-Oncology Medical Associates, Inc.'s Class Action
3 Settlement Agreement ("Agreement") as fair, reasonable and adequate to the class, and issued an
4 order to that effect (the "Final Order"). Now, therefore, it is hereby ordered, adjudged, and
5 decreed that:

6 1. Except as set forth in the Agreement and Final Order, Plaintiff Silva Avoyan and
7 the Settlement Class Members shall take nothing with respect to the class and representative
8 allegations set forth in the operative complaint;

9 2. As previously ordered by this Court in granting both Plaintiff's Motion for
10 Preliminary Approval of Class Action Settlement on June 22, 2020 and Plaintiff's Motion for
11 Final Approval of Class Action Settlement on November 16, 2020, this Court certifies the
12 following class:

13 All current and former non-exempt employees employed by
14 Synergy Hematology-Oncology Medical Associates, Inc. in
15 California from March 9, 2014 through the date of entry of the
16 order granting preliminary approval of this Settlement.

17 3. This judgment shall not be binding on Tatyana Sharfman, the one class member
18 who submitted a timely request for exclusion by the opt-out deadline of October 2, 2020;

19 4. This Judgment shall incorporate the following release as identified in the
20 Agreement at Section 19:

21 [A]ny and all known and unknown claims, losses, damages,
22 liquidated damages, penalties, interest, liabilities, causes of action,
23 civil complaints, arbitration demands or suits which arise from the
24 acts, facts, transactions, theories, occurrences, representations or
25 omissions asserted, or which could have been asserted, in the
26 Action, including, without limitation to, all claims under the
27 California Labor Code as alleged in the Action for failure to pay
28 overtime or minimum wages, failure to timely pay wages, waiting

1 time penalties, penalties under the Private Attorneys General Act
2 sections 2698, et seq., violations of California Unfair Competition
3 Law (Cal. Bus. & Prof. Code §§ 17200, et seq.), or for other
4 remuneration whether sought under statute, tort, contract, as an
5 unfair business practice, or otherwise.

6 5. Pursuant to the Agreement, Code of Civil Procedure Section 664.6, and Rule
7 3.769(h) of the California Rules of Court, this Court shall retain jurisdiction over Plaintiff Silva
8 Avoyan, all Settlement Class Members, and Defendant Synergy Hematology-Oncology Medical
9 Associates, Inc. to enforce the terms of the Agreement, the Final Order, and this Judgment.

10 **IT IS SO ORDERED AND ADJUDGED.**

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12 DATED: 12-1-20

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14 
15 Honorable Ann I. Jones
16 Judge of the Superior Court
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