

**FILED**  
Superior Court of California  
County of Los Angeles

**JAN 12 2021**

Herri R. Carr  
*Alfredo Morales* deputy clerk  
ALFREDO MORALES

1 AARON C. GUNDZIK (State Bar No. 132137)  
2 REBECCA G. GUNDZIK (State Bar No. 138446)  
3 GUNDZIK GUNDZIK HEEGER LLP  
4 14011 Ventura Blvd., Suite 206E  
5 Sherman Oaks, CA 91423  
6 Telephone: (818) 290-7461  
7 Facsimile: (818) 918-2316

8 JONATHAN M. LEBE (State Bar No. 284605)  
9 LEBE LAW, A PROFESSIONAL LAW CORPORATION  
10 777 S. Alameda Street, Second Floor  
11 Los Angeles, CA 90021  
12 Telephone: (213) 358-7046  
13 Facsimile: (310) 820-1258

14 Attorneys for Plaintiff Jason Mitchiner, individually,  
15 on behalf of all others similarly situated

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
17 **FOR THE COUNTY OF LOS ANGELES**

18 JASON MITCHINER, individually and on  
19 behalf of all others similarly situated,  
20  
21 Plaintiff,  
22  
23 v.  
24 COX TARGET MEDIA, INC., a Delaware  
25 corporation, VALPAK FRANCHISE  
26 OPERATIONS, INC. a Delaware corporation;  
27 and DOES 1 through 25,  
28 Defendants.

Case No.: 19STCV00319  
*Assigned to Hon. Amy D. Hogue  
Dept. SSC-7*  
~~PROPOSED~~ JUDGMENT  
**Date: January 12, 2021**  
**Time: 11:00 a.m.**  
**Dept.: 7**  
Complaint filed: January 7, 2019

19 On January 12, 2021, the Court entered an Order granting the motion for final  
20 approval of class action settlement of Plaintiff Jason Mitchiner, individually and on behalf  
21 of all others similarly situated (“Plaintiff”) (“Order”).

22 Having entered the Order, pursuant to California Rule of Court 3.769, the Court  
23 hereby enters Judgment as follows:

24 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

- 25 1. Judgment is entered in favor of Plaintiff Jason Mitchiner and the Class and  
26 against Defendants Cox Target Media, Inc. and Valpak Franchise Operations, Inc.  
27 (“Defendants”) in the amount of \$121,020 plus \$398.70. This obligation has been partially  
28 satisfied in the amount of \$21,020.

1           2.       The settlement funds to be paid by Defendants are to be distributed as set  
2 forth the Order.

3           3.       The Class in this action is defined as all individuals who worked in California  
4 as outside sales employees for Defendants from January 7, 2015 through August 5, 2019.

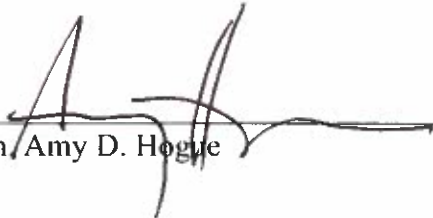
5           4.       No Class Members have opted out of the Settlement and therefore all Class  
6 Members are bound by this Judgment.

7           5.       Pursuant to the terms of the Settlement Agreement, upon Defendants'  
8 payment of all amounts due as specified in the Order and Settlement Agreement, all Class  
9 Members are deemed to have released Defendants, their respective affiliates, subsidiaries,  
10 parent companies, predecessor entities, successor entities, related companies, partners,  
11 officers, directors, managers, servants, agents, employees, former employees,  
12 representatives, and attorneys, past or present, and all persons acting under, by, though, or in  
13 concert with any of them (collectively, the "Releasees"), from any and all claims asserted in  
14 the Complaint and any other claims based on the same cited statutes or underlying facts.  
15 The time period governing these released claims shall be at any time from January 7, 2015  
16 through August 5, 2019. Claims and damages that were not alleged in the Complaint and do  
17 not arise from the facts alleged in the Complaint are specifically excluded from the release.

18           6.       Without affecting the finality of this Judgment, the Court retains exclusive  
19 and continuing jurisdiction over the litigation for purposes of supervising, implementing,  
20 interpreting and enforcing the terms of its Order granting Final Approval of the Settlement  
21 Agreement, and in order to conduct further hearing(s) on certification of distribution  
22 procedures.

23  
24 Dated: \_\_\_\_\_

1/12/2021

25   
Hon. Amy D. Hogue