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KENNETH H. YOON (State Bar No. 198443) STEPHANIE E. YASUDA (State Bar No. 265480) 2 FILED BRIAN G. LEE (State Bar No. 300990) Superior Court of California County of Los Angeles YOON LAW, APC 3 One Wilshire Blvd., Suite 2200 FEB 24 2021 Los Angeles, California 90017 4 Telephone: (213) 612-0988 Cherri R. Carter, Executive Officer/Clerk of Court 5 Kevin Mahoney, Esq. (SBN: 235367) Deputy Atoy H. Wilson (SBN: 305259) 6 MAHONEY LAW GROUP, APC 249 E. Ocean Boulevard, Suite 814 7 Long Beach, CA 90802 Telephone No.:562-590-5550 8 Facsimile No.: 562-590-8400 Christopher J. Hamner, Esq. (SBN 197117) HAMNER LAW OFFICES, APLC 10 26565 West Agoura Road, Suite 200-197 Calabasas, California 91302 11 Telephone: (888) 416-6654 12 Jose Renato Garay (SBN 200494) JOSE GARAY APLC 13 249 E Ocean Blvd., Ste. 814 Long Beach, CA 90802-4899 RECEIVED 14 (949) 208-3400 JAN 29 2021 15 Attorneys for Plaintiffs Jessy Correa, Brittany Roderick, FILING WINDOW Eric Andrade, and Henry Linares Rodriguez 16 SUPERIOR COURT OF THE STATE OF CALIFORNIA 17 FOR THE COUNTY OF LOS ANGELES 18 JESSY CORREA, BRITTANY RODERICK. Case No.: 19STCV37441 (and related Case 19 ERIC ANDRADE, and HENRY LINARES No. 20STCV05329) RODRIGUEZ, each as individuals and on 20 behalf of all others similarly situated. [Assigned for all purposes to the Hon. William F. Highberger, Dept. 10] 21 22 23 Plaintiff, PROPOSED JUDGMENT V. Date Filed: October 21, 2019 HARBOR DISTRIBUTING, LLC, a limited 24 liability company, and DOES 1 through 50, inclusive. 25 Defendants. 26 27 28

PROPOSED JUDGMENT

- 1. The Court hereby enters final judgment in this Action in accordance with terms of the Stipulation of Class, Collective, and Representative Actions ("Settlement"), order granting preliminary approval of class action settlement ("Procedural Order"), and the final order approving class action settlement ("Final Order").
- 2. Upon full and final payment by Defendant of the Gross Settlement Value consistent with Section VIII(C) of the Settlement and the employer's share of payroll taxes, Plaintiffs/Class Representatives and all Participating Settlement Class Members, shall have by operation of the Final Order and this Judgment, fully, finally and forever released, relinquished, and discharged the Released Parties from the Released California Claims, as those terms are respectively defined in the Settlement, and are hereby forever barred and enjoined from prosecuting such released claims against the Released Parties. There were no opt-outs in this matter.
- 3. Upon entry of the Final Order, all members of the PAGA Aggrieved Employee Group release all claims arising under PAGA during the PAGA Claim Period. Except as to the right to enforce the terms and conditions of this Settlement Agreement, all members of the PAGA Aggrieved Employee Group, regardless of whether they request to be excluded from this Settlement or not, fully release the Released Parties from the Released PAGA Claims.
- 4. Any FLSA Collective Member who opts in to the FLSA collective by cashing or depositing a settlement check from the FLSA Released Claims Amount will release the Released Parties from the FLSA Released Claims. FLSA Collective Members who do not cash or deposit a settlement check from the FLSA Released Claims Amount do not release any FLSA claim.
- 5. Without affecting the finality of the Final Order and/or this Judgment, pursuant to California Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of Court, the Court reserves exclusive and continuing jurisdiction over this Action, Class Representatives, Participating Settlement Class Members, and Defendant for the purposes of

| 1. | supervising the implementation, enforcement, construction, and interpretation of the | | | | |
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| 2 | Settlement, the Procedural Order, the Final Order, and the Judgment. | | | | |
| 3 | IT IS SO ORDERED. | | | | |
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| 5 | Dated: The Dated | | | | |
| 6 | Hon. William F. Highberger Judge of the California Superior Court | | | | |
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| 2 | STAT | TE OF CALIFORNIA) | | | |
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| 2 | COUNTY OF LOS ANGELES) | | | | |
| 3 | I am employed in the County of Los Angeles, State of California. I am over the age of 18 years | | | | |
| 5 | On January 29, 2021, I served the following documents described as: | | | | |
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| 8 | on all interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as shown on the attached mailing list. | | | | |
| 9 | [] | (BY FACSIMILE) | | | |
| 10 | | I am readily familiar with the business practices of this office. The telephone number of the facsimile machine I used was (213) 489-9961. This facsimile machine complies with Rules 2003(3) of the California Rules of Court. Upon transmission, no error was reported by the | | | |
| 11 | | facsimile machine and a printed copy of the machine's transmission record indicating that the transmission was successfully completed is attached to this declaration. | | | |
| 12 | [X] | (BY E-MAIL) | | | |
| 13 | | The documents were sent as an attachment to an email, with two types of delivery confirmation: Delivery Receipt and Read Receipt. Upon sending, no error was reported and I received a Delivery Receipt, confirming that the message and documents reached the above email address | | | |
| 14 | r 1 | | | | |
| 15 16 | [] | (BY CASE ANYWHERE) Based on a court order to accept service by electronic means, I caused a true and correct copy of the document(s) to be served electronically on counsel of record by transmission to Case Anywhere. | | | |
| 17 | [] | (BY MAIL) | | | |
| 18 | | I am familiar with my employer's mail collection and processing practices; know that mail is collected and deposited with the United States Postal Services on the same day it is deposited in the interoffice mail; and know that postage thereon is fully prepaid. | | | |
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| 20 | [] | (BY FEDERAL EXPRESS COURIER AND COURTESY EMAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence | | | |
| 21 | | for Federal Express delivery. Under that practice it would be deposited with the Federal | | | |
| Express Courier on that same day at Los Angeles, 6 business. | | Express Courier on that same day at Los Angeles, California in the ordinary course of business. | | | |
| 23 | [X] | (State) I declare under penalty of perjury that the above is true and correct. | | | |
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| 26 | | Executed on January 29, 2021, at Los Angeles, California | | | |
| 27 | - | GENESIS HERNANDEZ | | | |
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PROOF OF SERVICE

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Jessy Correa v. Harbor Distributing, LLC Superior Court of California, County of Los Angeles, Case No.: 19STCV37441

SERVICE LIST

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