

1 **SHADIE L. BERENJI (SBN 235021)**  
2 [berenji@employeejustice.law](mailto:berenji@employeejustice.law)  
3 **KRISTOPHER N. TAYYEB (SBN 320126)**  
4 [tayyeb@employeejustice.law](mailto:tayyeb@employeejustice.law)  
5 **BERENJI LAW FIRM, APC**  
6 8383 Wilshire Boulevard, Suite 708  
7 Beverly Hills, California 90211  
8 Telephone: (310) 855-3270  
9 Facsimile: (310) 855-3751

10 Attorneys for Plaintiff HENDERSON DONIS  
11 and Non-Party JAHAD MUHAMMAD, individually and on behalf  
12 of others similarly situation, and on behalf of the general public

13 *[Additional counsel listed on following page]*

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

HENDERSON DONIS as an individual and  
on behalf of others similarly situated,

Plaintiffs,

v.

BATTLE-TESTED STRATEGIES, LLC, a  
California Limited Liability Company, and  
Does 1 through 50, Inclusive,

Defendants.

Case No.: 21STCV21052

*Assigned for all purposes to the  
Hon. Elihu M. Berle, Dept. SS6*

**~~[PROPOSED]~~ JUDGMENT**

**FILED**  
Superior Court of California  
County of Los Angeles  
**03/27/2024**  
David W. Slayton, Executive Officer / Clerk of Court  
By: M. Fregoso Deputy

1 **JENNIFER KRAMER (SBN 203385)**

2 [jennifer@employmentattorneyla.com](mailto:jennifer@employmentattorneyla.com)

3 **HENNIG KRAMER RUIZ & SINGH, LLP**

4 3600 Wilshire Blvd., Suite 1908

5 Los Angeles, CA 90010

6 Telephone: (213) 310-8301

7 Attorneys for Plaintiff HENDERSON DONIS

8 and Non-Party JAHAD MUHAMMAD, individually and on behalf  
9 of others similarly situation, and on behalf of the general public

10 **ROBERT ACKERMANN (SBN 112922)**

11 [videolaw@aol.com](mailto:videolaw@aol.com)

12 **LAW OFFICE OF ROBERT ACKERMANN**

13 11040 Santa Monica Blvd., Ste. 320

14 West Los Angeles, CA 90025

15 Telephone: (310) 479-2441

16 Attorney for Plaintiff HENDERSON DONIS

17 And Non-Party JAHAD MUHAMMAD, individually and on behalf  
18 of others similarly situation, and on behalf of the general public

1 This Court, having granted final approval of the Class Action and PAGA Settlement  
2 Agreement between Plaintiffs HENDERSON DONIS and JAHAD MUHAMMAD and  
3 Defendants BATTLE-TESTED STRATEGIES, LLC, AMAZON.COM SERVICES, INC.,  
4 AMAZON SERVICES LLC, and AMAZON LOGISTICS, INC. (collectively the “Parties”) in  
5 the above-entitled action, as set forth in the Court’s Order Granting Final Approval of Class  
6 Action Settlement, Attorneys’ Fees, Costs, and Class Representative Service Payments (“Final  
7 Approval Order”);

8 This Court HEREBY ORDERS, ADJUDGES AND DECREES that Judgment in this  
9 matter is entered in accordance with the Court’s Final Approval Order and the Parties’ Class  
10 Action and PAGA Settlement Agreement; and

11 This Court also sets an Order to Show Cause Re: Compliance with the Terms of the  
12 Settlement for December 2, 2024 at 08:30 AM in Department 6 at Spring Street Courthouse, and  
13 a November 25, 2024 deadline for the Parties to meet and confer and file a joint status report and  
14 a declaration from the administrator advising the Court of the status of the distribution of  
15 settlement funds.

16  
17 Dated: 03/27/2024, 2024



**Elihu M. Berle**

HON. ELIHU M. BERLE  
Elihu M. Berle / Judge

1 **PROOF OF SERVICE**

2 I, Kristopher N. Tayyeb, am employed in the County of Los Angeles, State of  
3 California. I am over the age of 18 and not a party to the within action; my business address is  
4 8383 Wilshire Blvd., Suite 708, Los Angeles, California, 90211.

5 On the date set forth below, I served the foregoing document, entitled: **[PROPOSED]**  
6 **JUDGMENT** on the following interested parties:

7 Tim Johnson, Esq. Counsel for Defendant BATTLE-TESTED  
8 Tim.Johnson@ogletreedeakins.com STRATEGIES, LLC  
9 Nikolas T. Djordjevski, Esq.  
10 Nikolas.djordjevski@ogletreedeakins.com  
11 Yousaf M. Jafri, Esq.  
12 Yousaf.jafri@ogletreedeakins.com  
13 Ogletree, Deakins, Nash, Smoak, & Stewart  
14 4660 La Jolla Village Drive, Suite 900  
15 San Diego, California 92122

12 Jennifer Kramer, Esq. Counsel for Plaintiffs HENDERSON  
13 jennifer@employmentattorneyla.com DONIS and JAHAD MUHAMMAD  
14 Ashley Cruz, Esq.  
15 ashley@employmentattorneyla.com  
16 Hennig Kramer Ruiz & Singh, LLP  
17 3600 Wilshire Blvd., Suite 1908  
18 Los Angeles, CA 90010

16 Robert Ackermann, Esq. Counsel for Plaintiff HENDERSON DONIS  
17 videolaw@aol.com and JAHAD MUHAMMAD  
18 Law Office of Robert Ackermann  
19 11040 Santa Monica Blvd., Ste. 320  
West Los Angeles, CA 90025

20 ☒ **[by ELECTRONIC SERVICE]** Based on a court order and an agreement of the  
21 parties to accept service by electronic transmission, I electronically served the above-  
22 listed document(s) by uploading the document(s) to the Case Anywhere website.

22 Albert Giang, Esq. Counsel for Defendants AMAZON  
23 agiang@kslaw.com LOGISTICS, INC., AMAZON.COM  
24 Kelly Perigoe, Esq. SERVICES, INC., and  
25 kperigoe@kslaw.com AMAZON.COM SERVICES LLC  
26 King & Spalding LLP  
27 633 West Fifth Street, Suite 1600  
28 Los Angeles, California 90071

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



**[by ELECTRONIC SERVICE]** Pursuant to California Code of Civil Procedure section 1010.6, I electronically served the above-listed document(s) on the parties listed herein by electronic transmission.




**STATE** - I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 26, 2024, at Beverly Hills, California.

Kristopher N. Tayyeb  
Print Name

By:

  
Signature