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Attorneys for Plaintiff, Rene Hernandez on behalf  
of himself and all others similarly situated and aggrieved

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

**12/13/2024**

David W. Slayton, Executive Officer / Clerk of Court

By: L. Ennis Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

RENE HERNANDEZ, on behalf of himself and  
all others similarly situated and aggrieved,

Plaintiff,

v.

TODD PIPE & SUPPLY, LLC; a terminated  
California limited liability company; TODD  
PIPE HOLDINGS, INC., a California  
corporation; MORSCO SUPPLY, LLC, a  
Texas limited liability company; and DOES 1  
through 100, inclusive,

Defendants.

CASE NO.: 22STCV30190

[Assigned to the Hon. Stuart M. Rice in Dept.  
1]

~~[PROPOSED]~~ JUDGMENT

## JUDGMENT

Pursuant to the Order Granting Final Approval of the Class Action and Representative Action Settlement, it is hereby **ORDERED, ADJUDGED AND DECREED** as follows:

1. Judgment in this matter is entered in accordance with the Court's Order Granting Motion for Final Approval of Class and PAGA Settlement Agreement ("Order Granting Final Approval") and the parties' Joint Stipulation Re: Class and PAGA Settlement Agreement ("Settlement," "Agreement" or "Settlement Agreement"). All terms used herein shall have the same meaning as defined in the Settlement Agreement.

2. The "Settlement Class" "Settlement Class Members" or "Class Members" are all persons currently or formerly employed by defendants Todd Pipe & Supply, LLC ("Todd LLC") and Todd Pipe Holdings, Inc. ("Todd Inc." and collectively, "Defendants") as hourly-paid, non-exempt employees in the State of California at any time during the period from September 15, 2018 through December 31, 2021 ("Class Period").

3. Zero (0) Class Members opted out of the Settlement, zero (0) Class Members objected to the Settlement, and zero (0) submitted any workweek disputes; thus, all Class Members are Participating Class Members.

4. Defendants shall fully fund the Gross Settlement Amount, and also fund the amounts necessary to fully pay Defendants' share of payroll taxes by transmitting the funds to the Administrator no later than 14 calendar days after the Effective Date. Effective Date means the date when all of the following events have occurred: (a) the Court enters a Judgment on its Order Granting Final Approval of the Settlement; and (b) the Judgment is final. The Judgment is final as of the latest of the following occurrences: (a) if no Participating Class Member objects to the Settlement, the day the Court enters Judgment; (b) if one or more Participating Class Members objects to the Settlement, the day after the deadline for filing a notice of appeal from the Judgment; or if a timely appeal from the Judgment is filed, the day after the appellate court affirms the Judgment and issues a remittitur.

5. For any Class Member whose Individual Class Payment check is uncashed and

1 cancelled after one hundred eighty (180) calendar days after the date of their issuance, the  
2 Administrator shall transmit the funds represented by such checks to the cy pres, Legal Aid at Work,  
3 180 Montgomery St., Suite 600, San Francisco, California 94104 for use in any county in California  
4 in need.

5 6. Effective upon entry of Judgment, the Order granting Final Approval of this Settlement,  
6 and on the date when Defendants fully fund the entire Gross Settlement Amount and fund all  
7 employer payroll taxes owed on the Wage Portion of the Individual Class Payments, Plaintiff, Class  
8 Members, and Class Counsel will release claims against all Released Parties as follows:

- 9 a. For the duration of the Class Period, all Participating Class Members, on behalf of  
10 themselves and their respective former and present representatives, agents,  
11 attorneys, heirs, administrators, successors and assigns, release Released Parties  
12 from all claims, rights, demands, liabilities, and causes of action that were alleged  
13 or reasonably could have been alleged based on the facts stated in the Operative  
14 Complaint including: (i) failure to pay overtime wages; (ii) failure to pay minimum  
15 wages and wages of any type; (iii) failure to provide meal periods or and/or pay meal  
16 period premiums; (iv) failure to provide rest periods and/or pay rest period  
17 premiums; (v) failure to pay all wages an accrued vacation/paid time off at  
18 separation; (vi) failure to issue timely accurate wage statements; (vii) failure to  
19 reimburse or indemnify necessary business expenses; and (viii) unfair business  
20 practices that could have been premised on the claims, causes of action on legal  
21 theories of relief described above or any of the claims, causes of action or legal  
22 theories of relief described above or any of the claims, causes of action or legal  
23 theories of relief pleaded in the Operative Complaint. (the "Class Released Claims").  
24 b. For the duration of the PAGA Period, all Aggrieved Employees are deemed to  
25 release, on behalf of themselves and their respective former and present  
26 representatives, agents, attorneys, heirs, administrators, successors, and assigns, the  
27 Released Parties from all claims for PAGA penalties that were alleged, or reasonably  
28

could have been alleged, based on the facts stated in the PAGA Notice and thereafter alleged in the Operative Complaint, including, claims for PAGA penalties pursuant to Labor Code sections 210, 226.3, 558, 1174.5, 1197.1, and 2699 in connection with alleged violations of Labor Code sections Labor Code sections 96, 98.6, 200, 201 201.3, 202, 203, 204, 226, 226.7, 227.3, 232, 232.5, 246, *et seq.*, 432, 510, 512, 1174, 1102.5, 1174, 1194, 1197, 1197.5, 1198.5, 2699, 2802, and 2810.5.

7. The parties released shall include: Defendants and each of its former and present directors, officers, shareholders, owners, members, attorneys, insurers, predecessors, successors, assigns, subsidiaries, parents and affiliates (“Released Parties”).

8. This document shall constitute a Judgment for purposes of California Rules of Court, Rule 3.769(h).

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**IT IS SO ORDERED, ADJUDGED AND DECREED.**



Dated: 12/13/2024 ~~2024~~

Stuart M. Rice / Judge

Judge of the Superior Court