1	Keith A. Custis (SBN 218818)	FILED	
2	kcustis@custislawpc.com CUSTIS LAW, P.C.	Superior Court of California County of Los Angeles	
3	2121 Avenue of the Stars, Suite 800	01/28/2025	
4	Los Angeles, California 90067 Telephone: (213) 863-4276	Danvid W. Staγtoni, Executive Officer / Clerk of Court By: A. He Deputy	
•	Facsimile: (213) 863-4277	By: A. He Deputy	
5	Attorneys for Plaintiff		
6	NINA JACKSON		
7	SUPERIOR COURT FOR THE STATE OF CALIFORNIA		
8	COUNTY OF LOS ANGELES		
9	NINA JACKSON, individually and on	Case No. 21STCV12389	
10	behalf of all others similarly situated,		
11	Plaintiff,	[ <del>PROPOSED]</del> JUDGMENT	
12	·	Date: January 28, 2025	
	VS.	Time: 10:30 a.m. Dept.: 12, Spring Street Courthouse	
13	QUANTUM BEHAVIORAL	Judge: Hon. Carolyn B. Kuhl	
14	SOLUTIONS, INC., a California corporation; GEVORK G.	[Assigned for all purposes]	
15	GEVOJANYAN, an individual; and	Action Filed: April 1, 2021	
16	DOES 1 through 20, inclusive,	Trial Date: None Set	
17	Defendants.		
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	rn.	1 <del>roposed</del> ] Judgment	
	[ <del>77</del>	KOPOSED J JUDGIMEN I	

### **JUDGMENT**

Pursuant to the Order Granting the Motion for Final Approval of the Class Action Settlement and Motion for Attorneys' Fees and Costs, and Class Representative Service Awards (the "Order Granting Final Approval"), it is hereby ORDERED, ADJUDGED, AND DECREED as follows:

- 1. Judgment in this matter is entered in accordance with, and incorporates by reference the findings of, the Court's Order Granting Final Approval Class Action Settlement. Unless otherwise provided herein, all capitalized terms used herein shall have the same meaning as defined in the Class and PAGA Action Settlement Agreement ("Settlement Agreement").
- 2. As provided by the Order Granting Final Approval, all Participating Class Members are barred from pursuing, or seeking to reopen, any of the Participating Class Members' Released Claims, as defined by the Settlement Agreement that arose between April 1, 2017 through February 9, 2024. (Settlement Agreement, ¶¶ 1.9, 1.11,1.33, 3.1). Consistent with the definitions provided in the Settlement Agreement, the Settlement Class consists of: "All current and former non-exempt employees who worked for defendant Quantum Behavioral Solutions, Inc. within the State of California at any time during the period beginning on April 1, 2017 and ending on February 9, 2024." (Settlement Agreement, ¶¶ 1.6, 1.11).
- 3. Separate and apart from the Participating Class Members' Released Claims specified above, all PAGA Members are barred from pursuing, or seeking to reopen, any of the PAGA Members' Released Claims, as defined by the Settlement Agreement, that arose between March 30, 2020 through February 9, 2024. (Settlement Agreement, ¶¶ 1.28, 1.31, 3.2).
- 4. Without affecting the finality of the Judgment, the Court shall retain exclusive and continuing jurisdiction over the above-captioned action and the parties, including all Class Members, for purposes of enforcing the terms of the Judgment entered herein.

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## CUSTIS LAW, P.C. 2121 AVENUE OF THE STARS, SUITE 800 LOS ANGELES, CALIFORNIA 90067

1	5	This document	shall constitute a judgment (and a separate document constituting tha
2	judgment) for purposes of California Rules of Court, Rule 3.769(h).		
3	I	T IS SO ORDERED,	ADJUDGED, AND DECREED.
4	Dated: _	Ræ), ĭæ¦^ÁGÌÉÄG€GÍ	mi.ra
5			Hon. <u>Carolyn B. Kuhl</u> Stuart M. Rice / Judge Judge of the Superior Court
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[PROPOSED] JUDGMENT

# CUSTIS LAW, P.C. 2121 AVENUE OF THE STARS, SUITE 800 LOS ANGELES, CALIFORNIA 90067

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## PROOF OF SERVICE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and not a party to the within action; my business address is 1999 Avenue of the Stars, Suite 110, Los Angeles, California 90067.

On January 3, 2025, I served the foregoing document(s) described as:

## [PROPOSED] JUDGMENT

on the interested parties in this action,

Michael Campbell Greg S. Labate Bernice Diaz Sheppard, Mullin, Richter & Hampton LLP 650 Town Center Drive, 10th Floor Costa Mesa, CA 92626-1993

by sending a true copy thereof to the other interested parties as follows:

- (BY PERSONAL SERVICE) By causing to be delivered the document(s) listed above to the person(s) at the address(es) set forth above.
- (BY ELECTRONIC TRANSMISSION THROUGH CASE ANYWHERE): I caused the foregoing document(s) to be sent to the parties listed on the Electronic Service List maintained by Case Anywhere.
- (BY EMAIL) By electronically mailing a true and correct copy through Custis Law, P.C.'s electronic mail system from kcustis@custislawpc.com to the email addresses set forth above pursuant to Rule 12 of the Judicial Council Emergency Rules and an agreement reached between the parties pursuant to Code of Civil Procedure § 1010.6.
- BY OVERNIGHT DELIVERY: I am readily familiar with the practice of Custis Law, P.C. for collection and processing of correspondence for overnight delivery and know that the document described herein will be deposited in a box or other facility regularly maintained by Federal Express for overnight delivery.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on January 3, 2025 in Los Angeles, California.

Keith Custis

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