

Lilit Tunyan (SBN 329351)
ltunyan@tunyanlaw.com
Artur Tunyan (SBN 349174)
atunyan@tunyanlaw.com
TUNYAN LAW, APC
535 N Brand Blvd. Suite 285
Glendale, California 91203
Telephone: (323) 410-5050

Seung Yang (SBN 249857)
seung.yang@thesentinel-firm.com
Tiffany Hyun (SBN 311743)
tiffany.hyun@thesentinel-firm.com
THE SENTINEL FIRM, APC
355 S. Grand Ave., Suite 1450
Los Angeles, California 90071
Telephone: (213) 985-1150
Facsimile: (213) 985-2155

Attorneys for Plaintiff KARINA A. SANTOYO,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

KARINA A. SANTOYO, as an individual and
on behalf of all employees similarly situated,

Plaintiff,

v.

A P R CONSULTING, INC., a California
Corporation; LIBERTY UTILITIES (PARK
WATER) CORP., a California Corporation;
LIBERTY UTILITIES (APPLE VALLEY
RANCHOS WATER) CORP., a California
Corporation; LIBERTY UTILITIES
(CALPECO ELECTRIC) LLC, a California
LLC; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV04117

[Assigned for all purposes to Hon. Carolyn B.
Kuhl, Dept. 12]

**AMENDED ~~PROPOSED~~ FINAL
JUDGMENT**

Action Filed: February 20, 2024
Trial Date: Not Set

FILED
Superior Court of California
County of Los Angeles

05/29/2025

David W. Saylor, Executive Officer / Clerk of Court

By: L. McGrené Deputy

1 **TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

2 Plaintiff KARINA A. SANTOYO (“Plaintiff”) and Defendants APR CONSULTING, INC.
3 (“Defendant APR”), LIBERTY UTILITIES (PARK WATER) CORP., LIBERTY UTILITIES (APPLE
4 VALLEY RANCHOS WATER) CORP., and LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
5 (“Defendants Liberty”) (hereinafter “Defendants”) (Plaintiff and Defendants are the “Parties”) have
6 reached terms of settlement of this action alleging a claim for relief pursuant to the Labor Code Private
7 Attorneys General Act of 2004, Labor Code § 2698, *et seq.* (“PAGA”).

8 Plaintiff, on behalf of the Parties, has filed a motion for an Order Approving Settlement of
9 Plaintiff’s Claims Brought Pursuant to the Private Attorney General’s Act of 2004 (“PAGA”)
10 (“Motion”) memorialized in the PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT
11 AGREEMENT AND RELEASE (the “Settlement”). A true copy of the Settlement is attached to the
12 Declaration of Lilit Tunyan as Exhibit 1.

13 The Court granted the Parties’ motion. The ORDER GRANTING PLAINTIFF’S
14 MOTION FOR AN ORDER APPROVING SETTLEMENT OF CLAIMS BROUGHT PURSUANT
15 TO THE PRIVATE ATTORNEY GENERAL’S ACT OF 2004 (“PAGA Settlement Order”), is
16 incorporated herein in its entirety.

17 The Court now enters Judgment following the entry of the PAGA Settlement Order. The
18 Judgment set forth herein is intended to be a final disposition of the Action in its entirety and is intended
19 to be immediately appealable. All capitalized terms used for purposes of this Judgment, not otherwise
20 defined herein, have the same meaning as given in the Settlement executed by the parties.

21 **JUDGMENT**

22 In accordance with and for the reasons stated in the PAGA Settlement Order, Judgment shall be
23 entered whereby the Plaintiff, the State of California, and the Aggrieved Employees, shall take nothing
24 from Defendants, except as expressly set forth in the Settlement, and as approved and awarded by the
25 Court.

26 The Aggrieved Employees are:

27 All non-exempt or hourly employees of Defendants Liberty who worked in California
28 and non-exempt or hourly employees placed to work for Defendants Liberty in
California including from Defendant APR from February 19, 2023 through May 29,

2025. Pursuant to PAGA, California Labor Code § 2699(1)(2), the Labor and Workforce Development Agency (the "LWDA") has been given timely notice of the Settlement and is therefore bound by this Judgment.

PAGA claims are released as follows:

All Aggrieved Employees are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, Defendants and the Released Parties from all claims for PAGA penalties Plaintiff and/or the Aggrieved Employees had, or may claim to have, against Defendants and Released Parties, arising out of the violations alleged in the Operative Complaint or the PAGA Notices submitted in connection with the Action, including failure pay all wages and hours worked, failure to provide meal periods, failure to provide rest breaks, failure to provide accurate itemized wage statements, failure to maintain accurate records, waiting time penalties, failure to reimburse necessary business expenditures, and failure to timely pay wages (i.e., Labor Code sections 201, 202, 203, 204, 210, 226, 226.3, 226.7, 246, 510, 512, 558, 1174, 1174.5, 1194, 1197, 1197.1, 1198, and 2802) (the "Released Claims"). This release is limited to claims arising during the PAGA Period.

Plaintiff and the Aggrieved Employees release the PAGA Claims pursuant to the terms of the Settlement.

All payments due under the Settlement will be made pursuant to the Settlement, the PAGA Settlement Order, and this Judgment.

Nothing in this Judgment or the Settlement will be construed as an admission or concession by any party.

Based on the foregoing and in accordance with the Settlement, each side to bear its own costs and attorneys' fees, except as provided by the Settlement Agreement.

Pursuant to this Judgment, the Court retains continuing jurisdiction over this action for purposes of supervising, administering, implementing, interpreting and enforcing this Judgment, as well as the Settlement.

JUDGMENT IS ENTERED ACCORDINGLY.

Dated: 05/29/2025



Hon. Carolyn B. Kuhl
LOS ANGELES COUNTY SUPERIOR COURT
JUDGE

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of
6 18 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285,
7 Glendale, California 91203.

8 On the date indicated below, I served the document described as: **AMENDED [PROPOSED] FINAL**
9 **JUDGMENT** on the interested parties in this action by sending a true copy thereof to interested parties
10 as follows and as stated on the attached service list:

11 Lonnie Giamela
12 lgiamela@fisherphillips.com

13 Harrison M. Thorne
14 hthorne@fisherphillips.com

15 Cina Kim
16 cakim@fisherphillips.com

17 Jack Ingram III
18 jingram@fisherphillips.com

19 **FISHER & PHILLIPS LLP**
20 2050 Main Street, Suite 1000 Irvine,
21 California 92614
22 Telephone: (949) 851-2424

23 *Attorneys for Defendant Liberty Utilities (Park Water) Corp.*

24 Amy R. Patton
25 arp@paynefears.com

26 Ryan Kilpatrick
27 rlk@paynefears.com

28 Connie Cason
ccason@paynefears.com

Arlene Barrantes
abarrantes@paynefears.com

PAYNE&FEARS LLP

4 Park Plaza, Suite 1100

Irvine, CA 92614

Telephone: (949) 851-1100

Facsimile: (949) 851-1212

Attorneys for Defendant APR Consulting, Inc.

22 [✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties
23 to accept electronic service, I caused the documents to be sent to the persons at the
24 electronic service addresses listed above via third-party cloud service
25 **CASEANYWHERE**. I did not receive an error message.

26 Executed on February 4, 2025 at Glendale, California.

27 Lilit Tunyan
28 Name