

SROURIAN LAW FIRM, P.C.

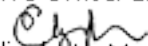
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VENTURA SUPERIOR COURT

FILED

08/22/2025

K. Bieker
Executive Officer and Clerk


Elizabeth Muller

Attorneys for Plaintiff and the [Proposed] Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

PATRICK STOCKTON, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

VENTURA RANCH RESORT, LLC; a
California Limited Liability Company; SCOTT
CORY, an individual; HR-PLUS, LLC, a
California Limited Liability Corporation; and
DOES 1 to 100, inclusive,

Defendants.

Case No.: 2021-00561683-CU-OE (Class
Action)

**[PROPOSED] FINAL ORDER AND
JUDGMENT GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 26, 2025

Time: 8:30 a.m.

Dept.: 21

Complaint Filed: March 23, 2021

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1 Plaintiff Patrick Stockton (“Plaintiff” or “Representative Plaintiff”), individually and on
2 behalf of himself and all other similarly situated non-exempt and/or hourly employees who worked
3 for defendants Ventura Ranch Resort, LLC (“VRR”) and Scott Cory (collectively “Defendants”)
4 (together with Plaintiff, the “Parties”), moved for an order requesting the Court grant final approval
5 of the Stipulation of Settlement and Release (the “Settlement Agreement” or “Settlement”).

6 Representative Plaintiff also requested that the Court award and approve the requested
7 attorney fees and costs, settlement administration costs, and Representative Plaintiff’s service award.

8 The Parties reached a settlement subject to Court approval as set forth in the Settlement
9 Agreement, which was previously filed with this Court.

10 The Court has conducted a Final Approval Hearing pursuant to Rule 3.769 of the California
11 Rules of Court, and this Court’s previous order granting Plaintiff’s Motion for Preliminary Approval
12 of Class Action Settlement (the “Preliminary Approval Order”), signed by the Court on January 26,
13 2025.

14 Due and adequate notice having been given to Class Members as set forth in the Preliminary
15 Approval Order, and the Court having considered all papers filed and proceedings conducted in this
16 case and otherwise being fully informed of the matter, and good cause appearing therefor:

17 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

- 18 1. For the reasons set forth in the Preliminary Approval Order (which is adopted and
19 incorporated herein by reference), the Court finds that the applicable requirements of
20 California Code of Civil Procedure §382 and Rule 3.769 of the California Rules of Court
21 have been satisfied with respect to the Settlement Class and the proposed Settlement. The
22 Court hereby makes final its earlier provisional certification of the Class, as set forth in the
23 Preliminary Approval Order.
- 24 2. This order and judgment hereby adopt and incorporate by reference the terms and conditions
25 of the Settlement Agreement, together with the definitions of the terms used and contained
26 therein, and all terms used herein shall have the same meaning as set forth in the Settlement
27 Agreement unless otherwise specifically stated.

- 1 3. The Court finds that it has jurisdiction over the subject matter of this class action and over all
2 parties to the action, including all members of the Settlement Class.
- 3 4. The Notice Packet provided to Settlement Class Members fully, adequately, and accurately
4 informed Settlement Class Members of all material elements of the proposed settlement and
5 of their opportunity to object, opt-out, or otherwise dispute matters in connection with the
6 Settlement. The Notice Packet was the best notice practicable under the circumstances; it
7 provided valid, due, and sufficient notice to all Settlement Class Members, and it complied
8 fully with the laws of the State of California, the United States Constitution, due process, and
9 other applicable law. The Notice Packet fairly and adequately described the Settlement and
10 provided Settlement Class Members adequate instructions and a variety of means to obtain
11 additional information. A full opportunity has been afforded to the Class Members to
12 participate in the Final Approval Hearing, and all Class Members and other persons wishing
13 to be heard have had such opportunity or been heard to the extent necessary. No Class
14 Members objected to the Settlement and only one Class Member requested exclusion from
15 the Settlement. Accordingly, the Court determines that all Class Members who did not timely
16 and properly execute a request for exclusion are bound by this order and judgment.
- 17 5. The Court has considered all relevant factors for determining the fairness of the Settlement
18 and has concluded that all such factors weigh in favor of granting final approval. In particular,
19 the Court finds that the Settlement was reached following meaningful discovery and
20 investigation conducted by Class Counsel; that the Settlement is the result of serious,
21 informed, adversarial, and arm's-length negotiations between the parties; and that the terms
22 of the Settlement are in all respects fair, adequate, and reasonable.
- 23 6. In so finding, the Court has considered all of the evidence presented, including evidence
24 regarding the strength of plaintiff's case; the risk, expense, and complexity of the claims
25 presented; the likely duration of further litigation; the amount offered in Settlement; the
26 extent of investigation and discovery completed; and the experience and views of Class
27 Counsel.
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- 1 7. Accordingly, the Court hereby approves the Settlement in all respects as set forth in the
2 Settlement and expressly finds that said Settlement is, in all respects, fair, adequate, and
3 reasonable, and in the best interests of the entire Settlement Class, and hereby orders and
4 directs implementation of all remaining terms, conditions, and provisions of the Settlement.
- 5 8. The Court certifies the Class for settlement purposes only and finds that the Class meets all
6 applicable standards for certification under California law. For purposes of the Settlement,
7 the Class is defined as follows: “All current and former non-exempt and/or hourly-paid
8 employees of Defendants working in California from and including March 23, 2017 through
9 October 24, 2024, which was the date that the Court granted preliminary approval of this
10 Settlement.” It shall be an opt-out class.
- 11 9. Representative Plaintiff Patrick Stockton is approved and appointed as the lead and
12 representative plaintiff for purposes of the Settlement.
- 13 10. Daniel Srourian of the Srourian Law Firm, P.C. is approved and appointed as Class Counsel
14 for purposes of the Settlement.
- 15 11. By this order and judgment, all Settlement Class Members fully, finally, and forever release,
16 relinquish, settle, and discharge all Settled Claims against the Released Parties, and
17 Representative Plaintiff fully, finally, and forever releases, relinquishes, settles, and
18 discharges all Settled Claims against the Released Parties, all Generally Released Claims
19 against the Released Parties, and all Unknown Claims against the Released Parties.
- 20 12. The Court hereby approves and awards the requested attorney fees to Class Counsel in the
21 amount of \$31,885.48, as compensation for the attorney time spent on this matter from
22 inception through and including the Final Approval Hearing and for the other work related
23 to this case. The attorney fees request is fair and reasonable based on Class Counsel’s
24 showing requesting fees, costs, and service award.
- 25 13. The Court further approves: 1) Class Counsel’s requested costs in the amount of \$14,190.81;
26 and 2) the requested settlement administrator costs in the amount of \$7,850. These requested
27 costs have also been determined to be fair and reasonable based on Class Counsel’s showing
28 requesting fees, costs, and service award.

1 14. The Court hereby approves the requested service award to the Representative Plaintiff in the
2 amount of \$2,000 based on Class Counsel's showing requesting fees, costs, and service
3 award.

4 15. This Settlement, shall constitute a full and complete bar against the Settlement Class as to all
5 of the claims released by the Settlement and shall be res judicata and collateral estoppel with
6 respect to such released claims.

7 16. One Class Member, Jamee Baker, has timely requested to opt-out of the Settlement and shall
8 not be bound by this order and judgment, nor the Settlement Agreement and associated
9 release of claims provided therein.

10 17. By operation of this order and judgment, as of the Effective Date, the Parties, the Settlement
11 Administrator, and Settlement Class Members are ordered to perform and abide by their
12 respective duties and obligations under the Settlement.

13 18. The Court will hold a status conference on Tuesday, December 1, 2020 (parties suggest approximately
14 120 days after this Order) to confirm payment of all funds due in accordance with the
15 Settlement and that such funds have been distributed in accordance with the Settlement. The
16 Settlement Administrator shall provide a declaration to the Court no later than five (5) days
17 prior to the status conference concerning the receipt and deposit of the required payments and
18 the distribution of such funds in accordance with the Settlement and any other duties it has
19 performed in connection therewith as specified in the Settlement.

20 FINAL JUDGMENT


21 In accordance with, and for the reasons stated above herein, judgment is hereby rendered and
22 entered under and in accordance with the Final Approval Order, whereby the Representative Plaintiff
23 and all Settlement Class Members shall obtain that which is expressly set forth in the executed
24 Settlement Agreement, and provided for therein and in conformance with the Final Approval Order.

25 Pursuant to California Code of Civil Procedure §664.6 and Rule 3.769(h) of the California
26 Rules of Court and in accordance with Section VI.Q of the Settlement Agreement, this Court reserves
27 exclusive and continuing jurisdiction over this action, the Representative Plaintiff, Settlement Class
28 Members, and Defendants, for the purpose of supervising the implementation, enforcement,

1 construction, and interpretation of the Settlement Agreement, the Preliminary Approval Order, and
2 this Final Approval Order and Judgment, and to supervise the payment and distribution of the
3 amounts to be paid under the Settlement.

4 **IT IS SO ORDERED.**

5 Dated: 08/20/2025
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9 The Honorable Charmaine H. Buehner
10 Judge of the Superior Court
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