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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

VAN ALDRIDGE, an individual; and
GERMAIN PARRA, an individual.

Plaintiffs,

v.

TECHNOLOGY AND SUPPLY
MANAGEMENT, LLC a Virginia
Limited Liability Company; SCOTT J.
NOVAK, an individual, and DOES 1-
10.

Defendants.

Case No. 2:18-cv-01081-GW-AGR

~~PROPOSED~~ STIPULATED
JUDGMENT AND ORDER

1 Plaintiffs Van Aldridge and Germain Parra (collectively “Plaintiffs”)
2 commenced this civil action on February 8, 2018 against Technology and Supply
3 Management, LLC (“TaSM”) and Scott J. Novak (collectively “Defendants”) to
4 obtain damages, civil penalties, and other relief. Plaintiffs filed a First Amended
5 Complaint on April 18, 2018 and a Second Amended Complaint July 4, 2018. The
6 Second Amended Complaint alleges, *inter alia*, violations of the Fair Labor Standards
7 Act (“FLSA”) (29 U.S.C. § 201), the California Labor Code, and the Arizona Wage
8 Act in connection with TaSM’s alleged failure to pay wages due to Plaintiffs, and
9 alleges that Defendant Scott J. Novak is liable to Plaintiffs as an employer under the
10 FLSA for monies due to Plaintiffs for alleged violations of the FLSA.

11 On October 22, 2018, the Parties attended mediation and agreed to settle the
12 dispute.

13 The Parties, by and through their respective counsel, now jointly request that
14 the Court enter this Stipulated Final Judgment and Order (“Stipulated Judgment”).

15 **I. FINDINGS**

16 1. The Court has jurisdiction over the Parties and the subject matter of this
17 action.

18 2. The Parties agree to entry of this Stipulated Judgment, without
19 adjudication of the remaining issues of fact or law pleaded in the Second Amended
20 Complaint, to settle and resolve all matters in dispute arising from the conduct alleged
21 in the Second Amended Complaint to the date this Stipulated Judgment is entered. (A
22 copy of the Settlement Agreement is annexed hereto and made a part hereof.)

23 3. Defendants neither admit nor deny any allegations in the Second
24 Amended Complaint, except as stated in this Stipulated Judgment, including the
25 annexed Settlement Agreement. For purposes of this Stipulated Judgment,
26 Defendants admit the facts necessary to establish the Court’s jurisdiction over them
27 and the subject matter of this action.

28 4. As part of the settlement reached by the Parties, Defendant TaSM agreed

1 to pay Plaintiff Aldridge a gross settlement amount of \$8,311.58 and Plaintiff Parra
2 the gross settlement amount of \$2,824.20 which represented the amount of accrued
3 but unused Paid Time Off Plaintiffs had at the time their employment terminated,
4 which sums have been tendered and paid to Plaintiffs by TaSM.

5 5. As further part of the settlement reached by the Parties, the Parties agreed
6 to entry of this Stipulated Judgment.

7 **II. ORDER**

8 **IT IS HEREBY ORDERED** as follows:

9 1. A judgment for monetary relief and damages is entered in favor of
10 Plaintiffs and against Defendant TaSM as follows:

11 a. In favor of Plaintiff Aldridge in the amount of \$16,900; and

12 b. In favor of Plaintiff Parra in the amount of \$15,600.

13 2. A judgment of dismissal with prejudice is entered in favor of Defendant
14 Scott J. Novak for all claims and allegations in the Second Amended Complaint.

15 3. Within 14 days of entry of this Stipulated Order, counsel for Plaintiffs
16 may petition the Court for attorneys' fees and costs incurred in this action. Further, a
17 supplemental fee petition may be filed for attorneys' fees and costs incurred for
18 necessary tasks following the filing of the aforementioned fee petition. The briefing
19 on any fee petition filed in this action will be governed by the applicable Federal Rules
20 of Civil Procedure and applicable local and chamber rules.

21 4. Any attorneys' fees or costs awarded in this matter will be included in a
22 Final Judgment entered by this Court.

23 5. This Court retains jurisdiction of this matter for purposes of construction,
24 modification, and enforcement of this Stipulated Order.

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SIGNATURES OF THE PARTIES

DATED: _____

Van Aldridge

DATED: _____

Germain Parra

DATED: _____

Scott J. Novak

DATED: November 25, 2018

Technology and Supply Management, LLC

By: 

Its: President

APPROVED AS TO FORM

DATED: _____

PEREZ VAUGHN & FEASBY Inc.

Christopher W. Rowlett
Attorneys for Plaintiffs

LAW OFFICES OF TIMOTHY L. JOENS

DATED: _____

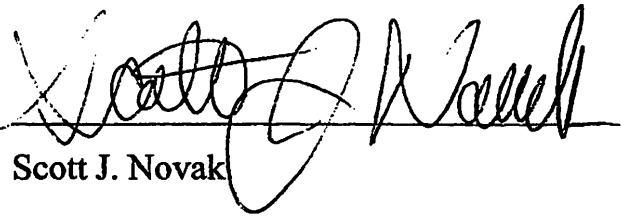
Timothy L. Joens
Attorneys for Defendants

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SIGNATURES OF THE PARTIES

DATED: _____
_____ Van Aldridge

DATED: _____
_____ Germain Parra

DATED: _____
_____  Scott J. Novak

DATED: _____ Technology and Supply Management, LLC
By: _____
Its: _____

APPROVED AS TO FORM

DATED: _____ PEREZ VAUGHN & FEASBY Inc.

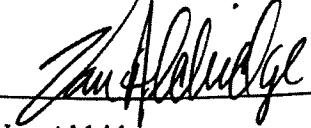
Christopher W. Rowlett
Attorneys for Plaintiffs

LAW OFFICES OF TIMOTHY L. JOENS
DATED: 11-28-15 _____
_____ Timothy L. Joens
Attorneys for Defendants

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SIGNATURES OF THE PARTIES

DATED: 11/26/2018 
Van Aldridge

DATED: _____
Germain Parra

DATED: _____
Scott J. Novak

DATED: _____ Technology and Supply Management, LLC
By: _____
Its: _____

APPROVED AS TO FORM

DATED: _____ PEREZ VAUGHN & FEASBY Inc.

Christopher W. Rowlett
Attorneys for Plaintiffs

LAW OFFICES OF TIMOTHY L. JOENS

DATED: _____

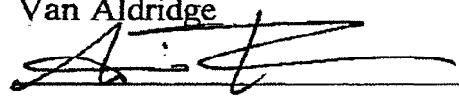
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SIGNATURES OF THE PARTIES

DATED: _____

Van Aldridge

DATED: 4/26/18



Germain Parra

DATED: _____

Scott J. Novak

DATED: _____ Technology and Supply Management, LLC

By: _____

Its: _____

APPROVED AS TO FORM

DATED: 11/28/2018

PEREZ VAUGHN & FEASBY Inc.



Christopher W. Rowlett
Attorneys for Plaintiffs

LAW OFFICES OF TIMOTHY L. JOENS

DATED: _____


Timothy L. Joens
Attorneys for Defendants

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JUDGMENT AND ORDER

IT IS SO ADJUDGED AND ORDERED

DATED: November 28, 2018



Hon. George H. Wu
United States District Judge