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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

JACQUELINE BALTAZAR an individual,
on behalf of herself, and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

WESTGATE HOTEL COMPANY, a
Corporation; SINCLAIR SERVICES
COMPANY, a Corporation; GRAND
AMERICAN HOTELS & RESORTS, INC.;
and DOES 1 through 30, Inclusive;

Defendants.

Case No. 37-2020-00005102

[PROPOSED] JUDGMENT

Date: August 27, 2021
Time: 1:30 p.m.

Judge: Hon. Timothy Taylor
Dept.: 72

1 Having read and carefully considering all matters related to the Joint Stipulation of Settlement of
2 Class Action Claims and Release of Claims and First Amendment thereto (collectively “Settlement
3 Agreement”, and having issued an Order Granting Final Approval of the Class Action Settlement,
4 Judgment is to be entered as follows:

5 In accordance with, and for the reasons stated in the Court’s Order Granting Plaintiff’s Motion
6 for Final Approval of Class Action Settlement, Judgment shall be entered whereby Plaintiff Jacqueline
7 Baltazar (“Plaintiff”) and the Settlement Class shall take nothing from defendants WESTGATE HOTEL
8 COMPANY, SINCLAIR SERVICES COMPANY, AND GRAND AMERICA HOTELS & RESORTS,
9 INC. (collectively “Defendants”) except as expressly set forth in the Settlement Agreement.

10 The Court hereby certifies as a class as follows:

11 ““All of defendants WESTGATE HOTEL COMPANY, SINCLAIR
12 SERVICES COMPANY and GRAND AMERICA HOTELS & RESORTS,
13 INC. current and former non-exempt employees employed in California at
14 the Westgate Hotel in San Diego between January 27, 2016 and February
15 14, 2020. The Settlement Class excludes any person who submits a timely
16 and valid request for exclusion.”

17 In exchange and consideration of the \$740,000 Total Settlement Amount, Judgment is entered by
18 which the Settlement Class is conclusively determined to have provided a release of, and permanently
19 enjoined and forever barred from asserting, the Released Claims against the Released Parties, pursuant
20 to the Settlement Agreement.

21 This Court shall retain jurisdiction with respect to all matters related to the administration and
22 consummation of the Settlement, and any and all claims, asserted in, arising out of, or related to the
23 subject matter of the lawsuit, including but not limited to all matters related to the Settlement and the
24 determination of all controversies relating thereto.

1 Plaintiff shall give notice of this Judgment to Class Members, pursuant to rule 3.771 of the
2 California Rules of Court, by posting an electronic copy of the Judgment on the Settlement
3 Administrator's website.

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5 IT IS SO ADJUDICATED.

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7 The Court directs that this Judgment shall be entered.

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9 IT IS SO ORDERED.

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11 Date: _____, 2021

12 The Honorable Judge of the Superior Court

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