

1 ZORIK MOORADIAN, Bar No. 136636

2 zorik@mooradianlaw.com

3 HAIK HACOPIAN, Bar No. 282361

4 haik@mooradianlaw.com

5 **MOORADIAN LAW, APC**

6 24007 Ventura Blvd., Suite 210

7 Calabasas, CA 91302

8 Telephone: (818) 487-1998

9 Facsimile: (888) 783-1030

10 Attorneys for Plaintiff Alberto Ramos, individually and on behalf of other persons
11 similarly situated and similarly aggrieved employees

12 [ADDITIONAL COUNSEL LISTED AFTER CAPTION]

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

15 ALBERTO RAMOS, individually and on
16 behalf of other persons similarly situated
17 and similarly aggrieved employees,
18 Plaintiffs,
19 v.

20 LIBERTY CONTAINER CORP., an
21 active California Limited Liability
22 Company; and DOES 1 through 10,
23 Defendants.

24 ROGER RODRIGUEZ on behalf of
25 himself and on behalf of all persons
26 similarly situated and similarly aggrieved
27 employees,

28 Plaintiff,

v.

LIBERTY CONTAINER COMPANY, a
California Corporation (aka Key
Container Company); and DOES 1-50,
Inclusive,

Defendants.

Case No.: 20STCV06560 (lead);
20STCV13959

CLASS AND REPRESENTATIVE
ACTION

*[Assigned to Hon. Lawrence Riff
in Dept. SS-7]*

**[PROPOSED] ORDER APPROVING
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS
REPRESENTATIVES' ENHANCEMENT
AWARDS, CLASS COUNSEL
ATTORNEYS' FEES AND COSTS,
SETTLEMENT ADMINISTRATION
COSTS, AND LWDA PAYMENT**

[FILED CONCURRENTLY WITH
PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT, CLASS
REPRESENTATIVES' ENHANCEMENT
AWARDS, CLASS COUNSEL
ATTORNEYS' FEES AND COSTS,
SETTLEMENT ADMINISTRATION
COSTS, AND LWDA PAYMENT;
DECLARATION OF HAIK HACOPIAN;
DECLARATION OF ZORIK
MOORADIAN; DECLARATION OF
JEREMY ROMERO; DECLARATION OF

1 JEAN-CLAUDE LAPUYADE;
2 DECLARATION OF SHANI O. ZAKAY;
3 DECLARATION OF ALBERTO RAMOS;
4 DECLARATION OF ROGER
5 RODRIGUEZ]

6 Date: October 7, 2022
7 Time: 11:00 a.m.
8 Dept.: SS-7

9 **ZAKAY LAW GROUP, APLC**
10 Shani O. Zakay (State Bar #277924)
11 shani@zakaylaw.com
12 5440 Morehouse Drive, Suite 3600
13 San Diego, CA 92121
14 Telephone: (619)255-9047
15 Facsimile: (858) 404-9203

16 **JCL LAW FIRM, APC**
17 Jean-Claude Lapuyade (State Bar #248676)
18 jlapuyade@jcl-lawfirm.com
19 5440 Morehouse Drive, Suite 3600
20 San Diego, CA 92121
21 Telephone: (619)599-8292
22 Facsimile: (619) 599-8291

23 Attorneys for Plaintiff Roger Rodriguez on behalf of himself and on behalf of all persons
24 similarly situated and similarly aggrieved employees
25
26
27
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1 On October 7, 2022, the Court considered the motion of Plaintiff Alberto Ramos and
2 Plaintiff Roger Rodriguez ("Plaintiffs") for Final Approval of Class Action Settlement and
3 Payment of: (1) Class Representatives' Enhancement Awards, (2) Class Counsel Attorneys'
4 Fees and Costs, (3) Settlement Administration Costs, and (4) LWDA Payment. Having
5 considered the Motion, and all legal authorities and documents concurrently and previously
6 submitted in support thereof, including the Amended Stipulated Settlement Agreement
7 ("Settlement Agreement"), and good cause appearing, IT IS HEREBY ORDERED that the
8 motion is GRANTED, subject to the following findings and orders:

9
10 1. This Court has jurisdiction over the subject matter of this litigation and over
11 the Parties to this litigation, including the Settlement Class;

12 2. Final approval shall be with respect to the Settlement Class defined as:
13 All non-exempt Union production employees (covered by the Collective Bargaining
14 Agreement) who are or previously were employed by Defendant in California during the
15 period of February 20, 2016 through July 28, 2021 ("Class Period").

16 3. The distribution of the Class Notice ("Notice Documents") to the Settlement
17 Class as set forth in the Settlement Agreement has been completed in conformity with
18 preliminary approval granted on May 19, 2022. The Notice Documents provided adequate
19 notice of the proceedings and about the case, including the proposed settlement terms and
20 the Release by Settlement Class as set forth in the Settlement Agreement. The Notice
21 Documents fully satisfied due process requirements. The Notice Documents were sent via
22 U.S. Mail to all persons entitled to such notice and every Settlement Class Member who
23 could be identified through reasonable effort. As executed, the Notice Documents
24 constituted the best notice practicable under the circumstances;

25 4. The Court hereby approves the terms set forth in the Settlement Agreement
26 and finds that the Settlement Agreement is, in all respects, fair, adequate, and reasonable
and directs the Parties to effectuate the Settlement Agreement according to its terms. The
Court finds that the Settlement Agreement has been reached as a result of informed and non-

1 collusive arm's-length negotiations. The Court further finds that the Parties have conducted
2 extensive investigation and research, and their attorneys were able to reasonably evaluate
3 their respective positions. The Court also finds that settlement now will avoid additional and
4 potentially substantial litigation costs, as well as delay and risks if the Parties were to
5 continue to litigate the case. The Court has reviewed the monetary recovery being provided
6 as part of the settlement and recognizes the significant value accorded to the Settlement
7 Class;

8 5. Defendant shall pay the Settlement Class pursuant to the procedure described
9 in the Settlement Agreement and the Notice Documents;

10 6. The Court hereby confirms the appointment of Plaintiff Alberto Ramos and
11 Plaintiff Roger Rodriguez as Class Representatives for settlement purposes and awards a
12 \$10,000 payment to each Plaintiff for their services to the Settlement Class. The Court finds
13 that these amounts are fair and reasonable in light of Plaintiffs' contributions to this
14 litigation and the risks they undertook in being the named plaintiffs. The enhancement
15 awards awarded under this paragraph shall be paid in accordance with the terms of the
16 Settlement Agreement;

17 7. The Court hereby confirms the appointment of Zorik Mooradian and Haik
18 Hacopian of the Mooradian Law, APC, Shani O. Zakay of Zakay Law Group, APLC, and
19 Jean-Claude Lapuyade of JCL Law Firm, APC as Class Counsel;

20 8. The Court hereby awards attorneys' fees in the amount of \$131,666.66 and
21 finds that the attorneys' fees requested are reasonable in light of the relevant factors under
22 California law. The attorneys' fees awarded under this paragraph shall be paid in accordance
23 with the terms of the Settlement Agreement;

24 9. The Court also awards costs in the amount of \$16,632.07 and finds that the
25 costs requested are reasonable in light of the relevant factors under California law. The costs
26 awarded under this paragraph shall be paid in accordance with the terms of the Settlement
27 Agreement;

1 10. The Court approves the payment of \$8,000 to CPT Group, Inc. for the fees
2 and costs of administering the settlement. The payment authorized by this paragraph shall
3 be made in accordance with the terms of the Settlement Agreement;

4 11. The Court approves the payment of \$7,500 to the California Labor and
5 Workforce Development Agency (“LWDA”) for release of the PAGA claims. The payment
6 authorized by this paragraph shall be made in accordance with the terms of the Settlement
7 Agreement;

8 12. The Court shall have and retain continuing jurisdiction over this action and
9 the Parties and the Settlement Class, including after the entry of this Order, to the fullest
10 extent necessary to interpret, enforce and effectuate the terms and intent of the Settlement
11 Agreement and this Order; and

12 13. A final distribution report is to be filed by _____.

13 Dated: _____

By: _____

Honorable Lawrence Riff
Judge of the Superior Court