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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 DENSON M. SALES; ANDRE
11 CLEMONS; ROBERT BEJAR; and
12 MARTIN CHAVEZ on behalf of
themselves, all others similarly situated,
and on behalf of the general public,

13 Plaintiff,

14 v.

15 UNITED ROAD SERVICES, INC.;
16 URS MIDWEST, INC. and DOES 1-
17 100, inclusive,

18 Defendants.
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Case No. 4:19-cv-08404-JST

*[Assigned to the Honorable Jon S. Tigar;
Department 6]*

~~[PROPOSED]~~ JUDGMENT

Complaint Filed: November 18, 2019

SAC Filed: May 18, 2023

Trial Date: May 20, 2024

The Court, having granted final approval of the Parties' Joint Stipulation of Settlement and Release of Class Action Claims (the "Agreement" or "Settlement Agreement"), as set forth in the Court's September 11, 2024, Order Granting Motion for Final Approval of Settlement and Granting Motion for Attorney's Fees (the "Final Approval Order"),

HEREBY ORDERS, ADJUDGES AND DECREES that this document shall constitute a Judgment pursuant to Rule 54(b) of the Federal Rules of Civil Procedure. Judgment in this matter is entered in accordance with the findings made in the Final Approval Order and the Settlement Agreement, which are incorporated herein by this reference as though set forth in full. The Court further directs as follows:

1. This Judgment is final and binding on Participating Class Members.
2. The Court hereby dismisses on the merits and with prejudice the claims asserted by Participating Class Members, as set forth in the Settlement Agreement, with Participating Class Members and Defendant to bear their own costs and attorneys' fees except as provided for in the Settlement Agreement and Final Approval Order.
3. Defendant and the Released Parties are hereby and forever released and discharged with respect to any and all claims or causes of action which Participating Class Members had or have for any of the Released Class Claims as defined in the Settlement Agreement.
4. Defendant and the Released Parties are hereby and forever released and discharged with respect to any and all claims or causes of action which PAGA Aggrieved Individuals had or have for any of the Released PAGA Claims as defined in the Settlement Agreement.
5. The United States District Court for the Northern District of California shall retain jurisdiction, which shall be exclusive to the extent permitted by law, over the implementation, enforcement, and performance of the Settlement Agreement, and shall have exclusive jurisdiction over any suit, action, proceeding, or dispute arising out of or relating to the Settlement Agreement or the applicability of the Settlement Agreement that cannot be resolved by negotiation and agreement by

Participating Class Members and Defendant. The Settlement Agreement shall be governed by and interpreted according to the substantive laws of the State of California without regard to its choice of law or conflict of laws principles.

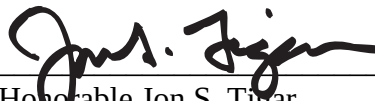
6. Without affecting the finality of the Judgment in any way, this Court hereby retains continuing jurisdiction over: (a) the distribution of Individual Settlement Amounts to Participating Class Members pursuant to the Settlement Agreement; (b) disposition of the Gross Settlement Amount; (c) the action until the Final Judgment contemplated hereby has become effective and each and every act agreed to be performed by the Parties all have been performed pursuant to the Settlement Agreement; and (d) all Parties to the action for the purpose of enforcing and administering the Settlement Agreement and the releases and other documents contemplated by, or executed in connection with, the Settlement Agreement.

7. The Court determines under Rule 54(b) of the Federal Rules of Civil Procedure, that Final Judgment should be entered and further finds that there is no just reason for delay in the entry of Judgment, as Final Judgment, as to the parties to the Settlement Agreement

8. Accordingly, the Clerk is hereby directed to enter Judgment forthwith against Defendant.

IT IS SO ORDERED.

Date: September 25, 2024


Honorable Jon S. Tigar
United States District Judge

4858-9552-1511, v. 1