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13 *Attorneys for Plaintiff Xi Chen*
14 *and all other Aggrieved Employees*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SAN FRANCISCO**

17 XI CHEN, individually, and on behalf of
18 herself and all other aggrieved employees,

19 Plaintiff,

20 vs.

21 CITY NATIONAL BANK, a national bank,
22 and DOES 1 through 100, inclusive,

23 Defendants.

Case No.: GCG-20-588614

**[PROPOSED] ORDER GRANTING
UNOPPOSED MOTION FOR APPROVAL
OF REPRESENTATIVE SETTLEMENT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT 2004**

Date: February 11, 2021

Time: 9:30 a.m.

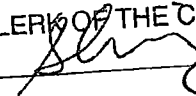
Dept.: 302

Complaint Filed: December 22, 2020

FILED
San Francisco County Superior Court

FEB 19 2021

CLERK OF THE COURT

BY: 

Deputy Clerk

[PROPOSED] ORDER

Plaintiff Xi Chen's Unopposed Motion For Approval Of Representative Settlement Under The Private Attorneys General Act Of 2004 came before this Court for hearing on February 19, 2021. Plaintiff's Unopposed Motion for Approval of Representative Settlement Under the Private Attorneys General Act 2004 is GRANTED.

The Parties to the Settlement Agreement, Plaintiff and Defendant City National Bank ("Defendant" or "CNB"), are hereby ORDERED to take all steps necessary to timely effectuate the terms of the Settlement Agreement, including the following:

Within 15 days of the Effective Date of the Settlement Agreement (as that term is defined in the Settlement Agreement"), CNB shall provide the Settlement Administrator, Phoenix Settlement Administration (the "Settlement Administrator") with a confidential "Settlement Group Database" including the full names, last known addresses, Social Security Numbers, and the number of pay periods during the time period of February 5, 2019 through the December 31, 2020 (the "Settlement Period.")

The Gross Settlement Fund of \$500,000.00 shall be funded by Defendant by wiring payment to the Settlement Administrator within 30 days of the Effective Date. Within 15 days after the Settlement Administrative has received from CNB the: (1) the Settlement Group Database and (2) the Gross Settlement Amount, the Settlement Administrator shall cause all Settlement Payments to be paid, including the payment to the LWDA, the payment to the Aggrieved Employees, and the payments to Plaintiff's Counsel for the approved attorney's fees and costs.

From the Gross Settlement Fund of \$500,000, the following amounts will be paid, with such payments issued by the Settlement Administrator:

- Plaintiff's Counsel's attorney's fees of \$125,000.00;
- Plaintiff's Counsel's litigation expenses of \$6,500.00; and
- Settlement administration expenses of the Settlement Administrator of \$5,000.00.

From the Net Settlement Fund of \$363,500 (\$500,000 minus fees, costs, and administration expenses), 75% of the Net Settlement Fund will be paid to the LWDA and the

1 remaining 25% of the Net Settlement Fund will be distributed among the Aggrieved Employees
2 on a pro rata basis according to their pay periods during the Settlement Period.

3
4 This action shall be dismissed with prejudice, with this Court retaining jurisdiction to
5 enforce the terms of this Order.

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7 IT IS SO ORDERED.

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9 Dated: 2/19, 2021
10 *GA*

Richard B. Ulmer
11 **RICHARD B. ULMER**
12 Judge of the Superior Court
13 San Francisco County Superior Court
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