

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
Romina Tamiry (SBN 328420)
rtamiry@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
ROSALBA RAMIREZ

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
ROSALBA RAMIREZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC2001161

*[Assigned to the Honorable Craig G. Riemer
in Dept. 1]*

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 19, 2021
Time: 8:30 a.m.
Dept.: 1

Confirmation No.: RES244965

Complaint Filed: March 11, 2020
Trial Date: None Set

1 The Motion of Plaintiff Rosalba Ramirez (“Plaintiff”) for Preliminary Approval of Class Action
2 Settlement (“Motion”) came on regularly for hearing before this Court on May 19, 2021 at 8:30 a.m. in
3 Department 1 based upon the terms and conditions set forth in the Stipulation of Settlement (the
4 “Settlement”), a copy of which is attached as **Exhibit 1** to the Declaration of Elizabeth Nguyen in
5 Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement.

6 The Court fully reviewed the Motion for Preliminary Approval; Memorandum of Points and
7 Authorities in support thereof; supporting declarations filed therewith; the Settlement and all exhibits
8 thereto, including the following documents:

- 9 1. Notice of Pendency of Class Action and Proposed Settlement (“Class Notice”), a copy
10 of which is attached hereto as **Exhibit A**;
- 11 2. Dispute Regarding Notice of Settlement, a copy of which is attached hereto as **Exhibit**
12 **B**;
- 13 3. Request for Exclusion form, a copy of which is attached hereto as **Exhibit C**; and
- 14 4. The Objection Form, a copy of which is attached hereto as **Exhibit D**; and

15 As such, and good cause appearing, the Court HEREBY ORDERS THE FOLLOWING:

16 1. The Court GRANTS preliminary approval of the class action settlement as set forth in
17 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately
18 could be granted approval by the Court at a Final Fairness Hearing. For purposes of the Settlement,
19 the Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
20 defined community of interest among the members of the Settlement Class in questions of law and fact.
21 Therefore, for settlement purposes only, the Court grants conditional certification of the following
22 Settlement Class:

23 All current and former hourly employees of Defendant Molded Devices who
24 worked in California at any time from March 11, 2016 through February 13,
25 2021.

26 2. For purposes of the Settlement, the Court designates named Plaintiff Rosalba Ramirez
27 as Class Representative, and designates Scott M. Lidman, Elizabeth Nguyen, Milan Moore, and
28 Romina Tamiry of Lidman Law, APC and Paul K. Haines of Haines Law Group, APC as Class

1 Counsel.

2 3. The Court designates Phoenix Settlement Administrators as the third-party Settlement
3 Administrator for mailing notices.

4 4. The Court approves, as to form and content, the Notice of Pendency of Class Action
5 and Proposed Settlement, Dispute Regarding Notice of Settlement, Request for Exclusion Form, and
6 Objection Form.

7 5. The Court finds that the form of notice to the Settlement Class regarding the pendency
8 of the action and of the Settlement, and the methods of giving notice to Settlement Class members,
9 constitutes the best notice practicable under the circumstances, and constitute valid, due, and sufficient
10 notice to all members of the Settlement Class. The form and method of giving notice complies fully
11 with the requirements of California Code of Civil Procedure section 382, California Civil Code section
12 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and
13 other applicable law.

14 6. The Court further approves the procedures for Settlement Class members to opt out of
15 or object to the Settlement, as set forth in the Notice of Pendency of Class Action and Proposed
16 Settlement.

17 7. The procedures and requirements for filing objections in connection with the Final
18 Fairness Hearing are intended to ensure the efficient administration of justice and the orderly
19 presentation of any Settlement Class member's objection to the Settlement, in accordance with the due
20 process rights of all Settlement Class members.

21 8. The Court directs the Settlement Administrator to mail the Notice of Pendency of Class
22 Action and Proposed Settlement and Notice of Settlement Award to all of the Class members in
23 accordance with the terms of the Settlement. Any unresolved Dispute Regarding Notice of Settlement,
24 Request for Exclusion or Objection shall be submitted directly to the Settlement Administrator and not
25 filed with the Court. Upon receipt of any Dispute Regarding Notice of Settlement, Requests for
26 Exclusion or Objections, the Settlement Administrator shall forward copies of all Disputes Regarding
27 Notice of Settlement, Requests for Exclusion and Objections to counsel for all parties. The Settlement
28 Administrator shall file a declaration concurrently with the filing of the Motion for Final Approval of

Class Action Settlement which authenticates a copy of every Dispute Regarding Notice of Settlement, Request for Exclusion and Objection received by the Settlement Administrator. The Settlement Administrator shall give notice to any objecting Settlement Class member of any continuance of the hearing on Plaintiff's Motion for Final Approval of Class Action Settlement.

9. The Class Notice shall provide at least 60 calendar days' notice for Settlement Class members to opt out of, or object to, the Settlement.

10. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 1 of this Court, located at 4050 Main Street, Riverside, California 92501 on _____, 2021 at _____ a.m./ p.m.

11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, service award to Plaintiff, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act ("PAGA") should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	Date	Actual Date ¹
Defendants to provide Class Data to Settlement Administrator	30 calendar days after issuance of the preliminary approval order	June 18, 2021
Settlement Administrator to mail Notice Packets to Class Members	10 business days after receiving Class Information from Defendants	July 2, 2021
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator	August 31, 2021

¹ These dates are based on the Court granting preliminary approval at the hearing, currently noticed for May 19, 2021.

Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 Court days before the Final Fairness Hearing	
Final Fairness Hearing:	_____, 2021	

14. Pending the Final Fairness Hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

15. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

IT IS SO ORDERED.

Dated: _____, 2021

Honorable Craig G. Riemer
Judge of the Superior Court

EXHIBIT A

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

ROSALBA RAMIREZ, as an individual and on behalf
of others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California corporation;
and Does 1 through 100,

Defendants.

Case No. RIC2001161

**NOTICE OF PENDENCY OF CLASS
ACTION AND PROPOSED SETTLEMENT**

To: All current and former hourly employees who have worked for Defendant Molded Devices, Inc. (collectively, “Defendants” or “Molded Devices”) in California during the time period of March 11, 2016 through February 13, 2021. Collectively, these employees will be referred to as “Settlement Class Members.”

**PLEASE READ THIS NOTICE CAREFULLY
YOUR LEGAL RIGHTS MAY BE AFFECTED WHETHER YOU ACT OR NOT**

Why should you read this notice?

The Court has granted preliminary approval of a proposed class action settlement (the “Settlement”) in *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No. RIC2001161 (the “Lawsuit”). Because your rights may be affected by the Settlement, it is important that you read this notice carefully.

You may be entitled to money from this Settlement. Molded Devices’ records show that you were employed at Molded Devices as an hourly employee in California between March 11, 2016 through February 13, 2021 (the “Class Period”). The Court ordered that this Notice be sent to you because you may be entitled to money under the Settlement and because the Settlement affects your legal rights.

The purpose of this notice is to provide you with a brief description of the Lawsuit, to inform you of the terms of the Settlement, to describe your rights in connection with the Settlement, and to explain what steps you may take to object to or exclude yourself from the Settlement. If you do not exclude yourself from the Settlement and the Court finally approves the Settlement, you will be bound by the terms of the Settlement and any final judgment.

What is this case about?

Plaintiff Rosalba Ramirez (“Plaintiff”) brought this Lawsuit against Molded Devices seeking to assert claims on behalf of a class of current and former hourly employees who worked for Molded Devices in California at any time beginning March 11, 2016. Plaintiff Rosalba Ramirez is known as the “Class Representative,” and her attorneys, who also represent the interests of all Settlement Class members, are known as “Class Counsel.”

The Lawsuit alleges that Molded Devices failed to pay Settlement Class members all minimum wages, overtime wages, and all wages owed upon termination, and failed to provide to Settlement Class members all required meal and rest breaks. As a result of the foregoing alleged violations, Plaintiff also alleges that Defendant failed to maintain accurate payroll records, failed to provide accurate, itemized wage statements and also engaged in unfair business practices.

Molded Devices asserts that it has complied with California law at all times. Molded Devices denies that it has done anything wrong, and says that all non-exempt, hourly employees in the class were properly

compensated for all hours worked, were provided with meal and rest breaks, did take meal and rest breaks as required by law, were provided with accurate itemized wage statements, properly reimbursed for reasonable and necessary business expenses, and timely paid all wages at separation. Molded Devices denies that any unlawful policy or practice exists as to the above claims. Molded Devices further denies that it owes Settlement Class members any wages, restitution, penalties, or other damages. Accordingly, the Settlement constitutes a compromise of disputed claims and should not be construed as an admission of liability on the part of Molded Devices, which expressly denies all liability.

The Court has not ruled on the merits of Plaintiff's claims. However, to avoid additional expense, inconvenience, and interference with its business operations, Molded Devices has concluded that it is in its best interests and the interests of Settlement Class members to settle the Lawsuit on the terms summarized in this Notice. The Settlement was reached after mediation between the parties.

The Class Representative and Class Counsel support the Settlement after conducting an investigation of the facts and applicable law. Among the reasons for support are the defenses to liability potentially available to Molded Devices, the risk of denial of class certification, the inherent risks of trial on the merits, and the delays and uncertainties associated with litigation.

The Court has only determined that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable and that any final determination of those issues will be made at the final hearing.

If you are still employed by Molded Devices, your decision about whether to participate in the Settlement will not affect your employment. California law and Molded Devices' policies strictly prohibit unlawful retaliation. Molded Devices will not take any adverse employment action against or otherwise target, retaliate, or discriminate against any Settlement Class member because of the Settlement Class Member's decision to either participate or not participate in the Settlement.

Who are the Attorneys?

Attorneys for the Plaintiff / Settlement Class Members: LIDMAN LAW, APC Scott M. Lidman slidman@lidmanlaw.com Elizabeth Nguyen enguyen@lidmanlaw.com Milan Moore mmoore@lidmanlaw.com Romina Tamiry rtamiry@lidmanlaw.com 2155 Campus Drive, Suite 150 El Segundo, California 90245 Tel: (424) 322-4772 Fax: (424) 322-4775 www.lidmanlaw.com HAINES LAW GROUP, APC Paul K. Haines phaines@haineslawgroup.com 2155 Campus Drive, Suite 180 El Segundo, California 90245 Tel: (424) 292-2350 Fax: (424) 292-2355	Attorneys for Defendant Molded Devices, Inc. HILL, FARRER & BURRILL LLP James A. Bowles jbowles@hfbllp.com Elissa L. Gysi egysi@hfbllp.com 300 So. Grand Ave., 37th Floor Los Angeles, California 90071 Tel: (213) 621-0817 Fax: (213) 624-9441 www.hillfarrer.com
--	--

What are the terms of the Settlement?

On <<PRELIM APPROVAL DATE>>, the Court preliminarily certified a class, for settlement purposes only, of all current and former hourly employees who worked for Molded Devices in California at any time from March 11, 2016 through February 12, 2021. Settlement Class members who do not opt out of the Settlement pursuant to the procedures set forth in this Notice will be bound by the Settlement and will release their claims against Molded Devices as described below.

Molded Devices has agreed to pay \$350,000.00 (the “Gross Settlement Amount”) to fully resolve all claims in the Lawsuit, including payments to Settlement Class members, attorneys’ fees and expenses, payment to the Labor Workforce Development Agency (“LWDA”), settlement administration costs, and the Class Representative’s Service Award. Molded Devices’ share of payroll taxes associated with any wage payments to Settlement Class members shall be paid by Molded Devices separately from, and in addition to, the Gross Settlement Amount.

The following deductions from the Gross Settlement Amount will be requested by the parties:

Settlement Administration Costs. The Court has approved Phoenix Settlement Administrators (or a mutually agreeable alternative Settlement Administrator) to act as the “Settlement Administrator,” who is sending this Notice to you and will perform many other duties relating to the Settlement. The Court has approved setting aside up to \$3,995.00 from the Gross Settlement Amount to pay the Settlement administration costs.

Attorneys’ Fees and Expenses. Class Counsel have been prosecuting the Lawsuit on behalf of the Settlement Class Members on a contingency fee basis (that is, without being paid any money to date) and have been paying all litigation costs and expenses. The Court will determine the actual amount awarded to Class Counsel as attorneys’ fees, which will be paid from the Gross Settlement Amount. Settlement Class members are not personally responsible for any of Class Counsel’s attorneys’ fees or expenses. Class Counsel will ask for fees of up to one-third of the Gross Settlement Amount, which is estimated to be \$116,666.66, as reasonable compensation for the work Class Counsel performed and will continue to perform in this Lawsuit through Settlement finalization. Class Counsel also will ask for reimbursement of up to \$30,000.00 for verified costs Class Counsel incurred in connection with the Lawsuit.

Service Award to Class Representative. Class Counsel will ask the Court to award the Class Representative a service award in the amount of \$5,000.00, to compensate her for her service and extra work provided on behalf of the Settlement Class members.

LWDA Payment. Class Counsel will ask the Court to approve a payment in the total amount of \$30,000.00 as and for alleged civil penalties, payable pursuant to the California Labor Code Private Attorney General Act (“PAGA”). Per Labor Code section 2699(i), seventy-five percent (75%) of such penalties, or Twenty-Two Thousand Five Hundred Dollars and Zero Cents (\$22,500.00) will be payable to the LWDA, and the remaining twenty-five percent (25%), or Seven Thousand Five Hundred Dollars and Zero Cents (\$7,500.00), will be payable to certain Settlement Class members as the “PAGA Amount,” as described below.

Calculation of Individual Settlement Class Members’ Settlement Award. After deducting the Court-approved amounts above, the balance of the Gross Settlement Amount will form the Net Settlement Amount (“NSA”), which will be distributed to all Settlement Class members who do not submit a valid and timely Request for Exclusion (described below). The NSA is estimated at approximately \$171,838.34, to be shared among up to an estimated ■ Settlement Class members. The NSA will be divided as follows:

Each participating Settlement Class member shall receive a proportionate settlement share based upon the number of workweeks worked during the Class Period, the numerator of which is the Settlement Class member's total workweeks worked during the Class Period, and the denominator of which is the total workweeks worked by all Settlement Class members who worked during the Class Period.

In addition, the PAGA Amount will be allocated as follows. Each Settlement Class member who was employed by Molded Devices at any time from March 11, 2019 through February 13, 2021, shall receive a portion of the PAGA Amount proportionate to the number of workweeks that he or she worked during the period of March 11, 2019 through February 13, 2021, and which will be calculated by multiplying the PAGA Amount by a fraction, the numerator of which is the Settlement Class members' number of workweeks worked during this time period, and the denominator of which is the total number of workweeks worked by all Settlement Class members during this time period.

The estimate of the likely Individual Settlement Payment to the average Settlement Class Member is \$_____, and the estimate of the range of possible Individual Settlement Payments is from approximately \$_____ to \$_____.

Payments to Settlement Class Members. If the Court grants final approval of the Settlement, Settlement Awards will be mailed to all Settlement Class members who did not submit a completed, valid and timely Request for Exclusion form (described in more detail below). In addition, if the Court grants final approval of the Settlement, each Settlement Class members' share of the PAGA Amount will be mailed to all Settlement Class members who were employed by Molded Devices at any time from March 11, 2019 through February 13, 2021.

Payment by Molded Devices of Gross Settlement Amount. The Gross Settlement Amount shall be paid by Molded Devices within thirty (30) calendar days after the "Effective Date" which is defined as the latter of: (a) the Court's final approval of the settlement if no objections by or on behalf of Settlement Class Members have been filed; (b) the time for appeal has expired if an objection has been filed and no appeal has been filed or withdrawn; or (c) the final resolution of any appeal that has been filed.

Within ten (10) calendar days following Molded Devices' deposit of the Gross Settlement Amount with the Settlement Administrator, the Settlement Administrator will calculate Settlement Award amounts and provide the same to counsel for the Parties for review and approval. Within seven (7) calendar days of approval by counsel for the Parties, the Settlement Administrator will prepare and mail Settlement Awards, less applicable taxes and withholdings, to participating Settlement Class members.

Allocation and Taxes. For tax purposes, each Settlement Award shall be allocated as follows: Sixty Seven Percent (67%) as penalties and interest; and Thirty Three Percent (33%) as wages. The Settlement Administrator will be responsible for issuing to participating Settlement Class members IRS Forms 1099 for the amounts allocated as penalties and interest and IRS Forms W-2 for amounts deemed "wages." Settlement Class members are responsible for the proper income tax treatment of the Settlement award. The Settlement Administrator, Molded Devices and its counsel, and Class Counsel cannot provide tax advice. Accordingly, Settlement Class members should consult with their tax advisors concerning the tax consequences and treatment of payments they receive under the Settlement.

Release. If the Court approves the Settlement, the Settlement Class, and each Settlement Class member who has not submitted a timely and valid Request for Exclusion, will release Molded Devices and all of their past and present officers, directors, employees, and agents (collectively the "Released Parties"), from release all wage and hour claims for any and all violations of California's Labor Code and Unfair Competition Law based on the factual allegations alleged in the operative complaint with respect the following claims: Defendant's failure to pay for all hours worked (including minimum wages, straight time wages, and overtime wages), failure to provide meal periods, failure to authorize and permit rest periods, failure to timely pay all wages due at the time of termination, failure to maintain accurate payroll records, failure to furnish accurate, itemized wage statements, failure to timely pay wages during employment, civil penalties under California's Private Attorneys General Act of 2004 ("PAGA") based on the alleged Labor Code violations, and all

damages, interest, penalties, attorneys' fees, costs, and other amounts recoverable under said causes of action under California law, to the extent permissible, including but not limited to the California Labor Code and the applicable Wage Orders (collectively, the "Released Claims"). The time period of the Settlement Class Members' Release shall be the same time period as the Class Period.

Release of PAGA. Plaintiff and all Settlement Class Members who were employed by Molded Devices in California at any time from March 11, 2019 through February 13, 2021, will not have the opportunity to opt out or object to the PAGA Amount or opt-out of the release of the PAGA claim, although the release of PAGA claim will be subject to Court approval.

The releases identified herein shall be null and void should the Settlement not be fully funded.

Conditions of Settlement. The Settlement is conditioned upon the Court entering an order at or following the Final Approval Hearing finally approving the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class, and the entry of Judgment.

How can I claim money from the Settlement?

Do Nothing. If you do nothing, you will be entitled to your share of the Settlement based on the proportionate number of workweeks you worked during the Class Period (as explained above), and as stated in the accompanying Notice of Settlement Award. You also will be bound by the Settlement, including the release of claims stated above.

What other options do I have?

Dispute Information in Notice of Settlement Award. Your award is based on the proportionate number of workweeks you worked during the Class Period, the number of workweeks worked during the period of March 11, 2016 through February 13, 2021. The information contained in Molded Devices' records regarding all of these factors, along with your estimated Settlement Award, is listed on the accompanying Dispute Regarding Notice of Settlement Award. If you disagree with the information in your Dispute Regarding Notice of Settlement Award, you may submit a dispute, along with any supporting documentation, in accordance with the procedures stated in the Notice of Settlement Award. Any disputes, along with supporting documentation, must be postmarked no later than <<RESPONSE DEADLINE>>. **DO NOT SEND ORIGINALS; DOCUMENTATION SENT TO THE SETTLEMENT ADMINISTRATOR WILL NOT BE RETURNED OR PRESERVED.**

The Parties and the Settlement Administrator will evaluate the evidence submitted and discuss in good faith how to resolve any disputes submitted by Settlement Class members. The Settlement Administrator's decision regarding any dispute will be final.

Exclude Yourself from the Settlement. If you **do not** wish to take part in the Settlement, you may exclude yourself by completing the enclosed "Request for Exclusion" form and sending the completed "Request for Exclusion" form to the Settlement Administrator at <<INSERT ADMINISTRATOR CONTACT INFO>> postmarked no later than <<RESPONSE DEADLINE>>. To be valid, the Request for Exclusion **must** be completely filled out and signed. However, you cannot exclude yourself from the PAGA Amount discussed herein.

Any person who mails a timely and valid Request for Exclusion form shall, upon receipt by the Settlement Administrator, no longer be a Settlement Class member, shall be barred from participating in any portion of the Settlement, and shall receive no benefits from the Settlement (aside from a portion of the PAGA Amount if the person was employed by Molded Devices between March 11, 2019 through February 13, 2021). **Do not submit both a Dispute and a Request for Exclusion.** If you do, the Request for Exclusion will be invalid, you will be included in the Settlement Class, and you will be bound by the terms of the Settlement.

Objecting to the Settlement. You also have the right to object to the terms of the Settlement. However, if the Court rejects your objection, you will still be bound by the terms of the Settlement. If you wish to object to the Settlement, or any portion of it, you may complete the enclosed "Objection" form and mail it to the

Settlement Administrator. To be valid, the Objection form **must** be completely filled out and signed. Written objections must be postmarked on or before **<<RESPONSE DEADLINE>>**.

If you choose to object to the Settlement, you may also appear at the Final Approval Hearing scheduled for **<<FINAL APPROVAL HEARING DATE/TIME>>** in Department 1 of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501. You have the right to appear either in person or through your own attorney at this hearing. All objections or other correspondence must state the name and number of the case, which is *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No RIC2001161.

Any Class Member who elects to appear personally at the Court for any reason related to this Action must comply with the Court's social distancing and mandatory face covering requirements, as well and other orders related to COVID-19. All such rules and orders can be located at the Court's website: www.riversidecourts.ca.gov.

If you object to the Settlement, you will remain a member of the Settlement Class, and if the Court approves the Settlement, you will be bound by the terms of the Settlement in the same way as Settlement Class members who do not object.

What is the next step?

The Court will hold a Final Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement on **<<FINAL APPROVAL HEARING DATE/TIME>>**, in Department 1 of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501. The Court will also be asked to rule on Class Counsel's request for attorneys' fees and reimbursement of documented costs and expenses and the Enhancement Award to the Class Representative. The Final Approval Hearing may be postponed without further notice to Settlement Class members, except the Settlement Administrator will provide notice to any Settlement Class members who have submitted a timely objection. **You have the right to attend the Final Approval Hearing but are not required to do so. If you attend the hearing and/or retain your own separate attorney, it will be at your own expense.**

Any Settlement Class member who elects to appear personally at the Court for any reason related to this Action must comply with the Court's social distancing and mandatory face covering requirements, as well and other orders related to COVID-19. All such rules and orders can be located at the Court's website: www.riversidecourts.ca.gov.

The Court's final judgment will be posted on the Settlement Administrator's website (http://www._____.com).

How can I get additional information?

This Notice is only a summary of the Lawsuit and the Settlement. For more information, you may inspect the Court's files and the Settlement Agreement at the Office of the Clerk of the Riverside County Superior Court, located at 4050 Main Street Riverside, CA 92501, during regular court hours. You may also contact Class Counsel using the contact information listed above for more information or contact the Settlement Administrator.

You may also access the Court's electronic case file with the following steps; Go to <https://www.riverside.courts.ca.gov/>; (ii) Click on the "Online Services" tab; (iii) Click on the "Search Court Records" option; (iv) in the "Civil, Family Law & Probate Records"; (v) click on "Case Number Search" ; (vi) log onto your account or create an account if you do not have one; (viii) in the Case Number box enter "RIC2001161" and click "Search"; and (v) the name of the case should be appear "Ramirez vs. Molded Devices", click on the Case Number which appears to the right of the Case Name, you can view the schedule of upcoming hearings and other information about the case.

You may also obtain a copy of the Settlement by requesting a copy from the Settlement Administrator or by accessing the Court's electronic file as explained above, locate the entry for the "Compendium of Declarations Filed Concurrently with Plaintiff's Motion for Preliminary Approval Filed" on _____ 2021, locate the Declaration of Elizabeth Nguyen in Support of Plaintiff's Motion for Preliminary Approval attached to the Compendium as Exhibit 1, click on the document icon (it appears as a small camera) associated with that entry, and follow any additional prompts provided. The Settlement will be attached as Exhibit 1 to Ms. Nguyen's Declaration.

**PLEASE DO NOT CALL OR WRITE THE COURT FOR INFORMATION ABOUT THIS SETTLEMENT
OR THE SETTLEMENT PROCESS**

REMINDER AS TO TIME LIMITS

The deadline for submitting any Disputes, Requests for Exclusion, or Objections is <<RESPONSE DEADLINE>>. These deadlines will be strictly enforced.

BY ORDER OF THE COURT ENTERED ON <<PRELIM APPROVAL DATE>>.

EXHIBIT B

EXHIBIT B

DISPUTE REGARDING NOTICE OF SETTLEMENT AWARD

ROSALBA RAMIREZ V. MOLDED DEVICES, INC.
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

Please complete, sign, date and return this Form to <<ADMINISTRATOR CONTACT INFO>> **ONLY IF** (1) your personal contact information has changed, and/or (2) you wish to dispute any of the items listed in Section (III), below. It is your responsibility to keep a current address on file with the Settlement Administrator.

(I) Please type or print your name:

(First, Middle, Last)

(II) Please type or print the following identifying information if your contact information has changed:

Former Names (if any)

New Street Address

City

State

Zip Code

(III) Information Used to Calculate Your Individual Settlement Payment:

According to the records of Molded Devices, Inc. (collectively, "Molded Devices"):

- (a) you worked for Molded Devices for [REDACTED] workweeks during the period of March 11, 2016 through February 13, 2021;
- (b) and
- (c) you worked for Molded Devices for [REDACTED] workweeks during the period of March 11, 2019 through February 13, 2021.

Based on the above, your Individual Settlement Payment is estimated to be \$ [REDACTED].

(IV) If you disagree with items (a)-(b) in Section (III) above, please explain why in the space provided below and include copies of any supporting evidence or documentation with this form:

If you dispute the above information from Molded Devices' records, Molded Devices' records will control unless you are able to provide documentation that establishes that Molded Devices' records are mistaken. If there is a dispute about whether Molded Devices' information or yours is accurate, and the dispute cannot be resolved informally, the dispute will be resolved by the Parties and the Settlement Administrator as described in the "Notice of Pendency of Class Action and Proposed Settlement" that accompanies this Form. The Settlement Administrator's decision regarding any dispute will be final.

**ANY DISPUTES, ALONG WITH ANY SUPPORTING DOCUMENTATION, MUST BE POSTMARKED
NO LATER THAN <<RESPONSE DEADLINE>>.**

EXHIBIT C

EXHIBIT C

REQUEST FOR EXCLUSION FORM

ROSALBA RAMIREZ V. MOLDED DEVICES, INC.
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

**SUBMIT THIS FORM ONLY IF YOU WISH TO BE EXCLUDED FROM PARTICIPATING IN THE
CLASS ACTION SETTLEMENT**

By signing and returning this form, I represent that it is my desire to exclude myself from participating in the Settlement of the Class Action entitled ***Rosalba Ramirez v. Molded Devices, Inc.***, Riverside County Superior Court Case No. RIC2001161, and that I received notice of the Settlement, and that I do not want to participate and do not want to receive money from the Settlement.

Please note: Any person who submits this form will not receive a settlement payment, aside from a portion of the PAGA Amount if the person was employed by Molded Devices, Inc. between March 11, 2019 through February 13, 2021.

Name (Please Print): _____
(First) (Middle) (Last)

Address: _____
(Street)

(City) (State) (Zip)

Telephone No.: _____

Dated: _____ Signature: _____

**TO BE VALID, THIS FORM MUST BE POST-MARKED NO LATER THAN _____,
AND MAILED TO THE CLAIMS SETTLEMENT ADMINISTRATOR AT:**

Rosalba Ramirez v. Molded Devices, Inc.
Settlement Administrator
c/o _____

EXHIBIT D

EXHIBIT D

OBJECTION FORM

ROSALBA RAMIREZ V. MOLDED DEVICES, INC.
RIVERSIDE COUNTY SUPERIOR COURT CASE NO. RIC2001161

**COMPLETE THIS FORM ONLY IF YOU WISH TO OBJECT TO THE
CLASS ACTION SETTLEMENT**

In order for you to object to the Class Action Settlement entitled *Rosalba Ramirez v. Molded Devices, Inc.*, Riverside County Superior Court Case No. RIC2001161 you must complete all steps listed in 1-4 below.

You are not required to appear in Court in order to object to the Settlement but may appear if you wish to do so.

1. Provide the following information:

Your Name (Please Print): _____
(First) (Middle) (Last)

Your Address: _____

Telephone No.: _____

2. Describe your objection to the Settlement (please attach additional documents if you need more space):

3. Date and sign this form below:

Dated: _____ Signature: _____

4. MAIL A COPY OF THIS COMPLETED FORM TO THE SETTLEMENT ADMINISTRATOR AT THE ADDRESS BELOW SO THAT IT IS POST-MARKED NO LATER THAN _____.

Rosalba Ramirez v. Molded Devices, Inc.
Settlement Administrator
c/o _____