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**FILED**  
Superior Court of California  
County of Los Angeles

**DEC 16 2020**

Cherri R. Carter, Executive Officer/Clerk of Court  
By [Signature] Deputy  
Andrew Lin

**FAXED**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

JAMES GOODINE and GREG CRAWFORD, as  
individuals and on behalf of all others similarly  
situated,

Plaintiffs,

vs.

TEAM ONE LOGISTICS, LLC, a Georgia  
limited liability company; TEAM ONE  
CONTRACT SERVICES, LLC, a California  
Corporation; and DOES 1 through 100,

Defendants.

CASE NO. 19STCV28521

*[Case assigned for all purposes to the Hon.  
William F. Highberger, Dept. SSC10]*

**~~PROPOSED~~ JUDGMENT AND  
ORDER GRANTING PLAINTIFFS'  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT, CLASS  
REPRESENTATIVE ENHANCEMENT  
PAYMENTS, AND ATTORNEYS' FEES  
AND COSTS**

Date: December 16, 2020  
Time: 11:00 a.m.  
Dept.: SSC-10

Complaint Filed: August 15, 2019  
Trial Date: None Set

**RECEIVED**  
**NOV 16 2020**  
**FILING WINDOW**

**[PROPOSED] JUDGMENT AND ORDER GRANTING FINAL APPROVAL OF SETTLEMENT**

  
**[PROPOSED] ORDER**

The Motion of Plaintiffs James Goodine and Greg Crawford ("Plaintiffs") for Final Approval of Class Action Settlement, Class Representative Enhancement Payments, and Attorneys' Fees and Costs ("Final Approval Motion") came on regularly for hearing before this Court on December 16, 2020, at 11:00 a.m., pursuant to California Rule of Court 3.769 and this Court's prior Order Granting Preliminary Approval of Class Action Settlement. Having considered the parties' Stipulation of Settlement ("Settlement Agreement" or "Settlement") and the documents and evidence presented in support thereof, and recognizing the sharply disputed factual and legal issues involved in this case, the risks of further prosecution, and the substantial benefits to be received by the Settlement Class pursuant to the Settlement, the Court hereby makes a final ruling that the proposed Settlement is fair, reasonable, and adequate, and is the product of good faith, arm's-length negotiations between the parties. Good cause appearing therefor, the Court hereby GRANTS Plaintiffs' Final Approval Motion and HEREBY ORDERS THE FOLLOWING:

1. Final judgment is hereby entered in conformity with the Settlement and this Final Approval Order.

2. The conditional class certification is hereby made final, and the Court thus certifies, for purposes of the Settlement, the following Settlement Class:

All non-exempt drivers employed by Defendants Team One Logistics, LLC and Team One Contract Services, LLC (collectively, "Team One") in California from August 15, 2015, to May 8, 2020.

3. As of the date that this Judgment becomes final, all Settlement Class members, by virtue of this Judgment, shall release and discharge Team One Contract Services, LLC and Team One Logistics, LLC, all entities affiliated with them, and all officers, directors, representatives, owners, partners, subsidiaries, parent companies, joint venturers clients, joint employers, predecessors, managers, servants, successors-in-interest, assigns, current and former employees of Team One, agents, insurers, attorneys and all persons or entities acting in concert with or affiliated with any of them from all claims as pled in the operative complaint in *Goodine v. Team One Logistics, LLC, et al.*, Los Angeles County Superior Court, Case No. 19STCV28521, and

any further amended pleadings as necessary, including claims for: (1) failure to pay overtime wages; (2) minimum wage violations; (3) meal period violations; (4) rest period violations; (5) failure to reimburse necessary business expenses; (6) wage statement violations; (7) waiting time penalties; (8) unfair competition; and (9) civil penalties under PAGA, based on the factual allegations pled in the operative complaint (or which could have been pled based on the factual allegations pled in the operative complaint). This includes, but is not limited to, claims under Labor Code sections 201-204, 226 *et seq.*, 226.7, 510, 512, 516, 558, 1182.12, 1194, 1194.2, 1197, 1198, 2698 *et seq.*, 2802, 2804, Business and Professions Code section 17200, *et seq.*, IWC Wage Order 9-2001, and claims or potential claims for attorneys' fees and costs and interest ("Released Claims"). The time period for the Released Claims shall be from August 15, 2015, to May 8, 2020 and the release shall become effective upon the date this Judgment and Order is signed, or if there are objectors to the Settlement, the date upon which all time limitations for filing an appeal have expired (the "Effective Date").

4. Plaintiffs James Goodine and Greg Crawford are hereby confirmed as Class Representatives. Paul K. Haines, Fletcher Schmidt, and Andrew Rowbotham of Haines Law Group, APC are hereby confirmed as Class Counsel.

5. Notice was provided to Settlement Class members as set forth in the Settlement Agreement, which was approved by the Court on July 23, 2020, and the notice process has been completed in conformity with the Settlement Agreement and with this Court's orders. The Court finds that said notice was the best notice practicable under the circumstances. The Class Notice provided due and adequate notice of the proceedings and matters set forth therein, informed Settlement Class members of their rights, and fully satisfied the requirements of California Code of Civil Procedure § 1781(e), California Rule of Court 3.769, and due process.

6. The Court finds that no Settlement Class members objected to the Settlement, that no Settlement Class member opted out of the Settlement, and that the 100% participation rate in the Settlement supports final approval.

1           7.     The Court hereby approves the settlement as set forth in the Settlement Agreement  
2 as fair, reasonable, and adequate, and directs the parties to effectuate the Settlement Agreement  
3 according to its terms.

4           8.     For purposes of settlement only, the Court finds that: (a) the members of the  
5 Settlement Class are ascertainable and so numerous that joinder of all members is impracticable;  
6 (b) there are questions of law or fact common to the Settlement Class, and there is a well-defined  
7 community of interest among members of the Settlement Class with respect to the subject matter  
8 of the litigation; (c) the claims of the Class Representatives are typical of the claims of the  
9 members of the Settlement Class; (d) the Class Representatives have fairly and adequately  
10 protected the interests of the Settlement Class members; (e) a class action is superior to other  
11 available methods for an efficient adjudication of this controversy; and (f) Class Counsel are  
12 qualified to serve as counsel for the Class Representatives and the Settlement Class.

13           9.     The Court finds that given the absence of objections, and objections being a  
14 prerequisite to appeal, this Order shall be considered final as of the date it is signed by this Court.

15           10.    The Court orders that ~~within 15 calendar days of the Effective Date~~, Team One  
16 shall deposit the entire Gross Settlement Amount of \$175,000.00 into an account established by  
17 Phoenix Settlement Administrators ("Settlement Administrator"), as provided for in the  
18 Settlement Agreement.

19           11.    The Court finds that the Individual Settlement Payments, as provided for in the  
20 Settlement, are fair, reasonable, and adequate, and orders the Settlement Administrator to  
21 distribute the individual payments in conformity with the terms of the Settlement Agreement.

22           12.    The Court finds that the payment to the State of California Labor and Workforce  
23 Development Agency ("LWDA") in the amount of \$3,750.00 for its share of civil penalties under  
24 the California Labor Code Private Attorneys General Act ("PAGA") is fair, reasonable and  
25 adequate, and orders the Settlement Administrator to distribute this payment to the LWDA in  
26 conformity with the terms of the Settlement Agreement.

27           13.    The Court finds that a total enhancement payment in the amount of \$10,000.00  
28 (\$5,000.00 to each named Plaintiff) is appropriate for the risks Plaintiffs undertook and their

1 services to the Settlement Class. The Court finds that such an award is fair, reasonable, and  
2 adequate, and orders that the Settlement Administrator make these payments in conformity with  
3 the terms of the Settlement Agreement.

4 14. The Court finds that attorneys' fees in the total amount of \$58,333.33, and actual  
5 litigation costs of \$10,843.74, are fair, reasonable, and adequate in light of the common fund  
6 provided for the benefit of the Settlement Class, and orders that the Settlement Administrator  
7 distribute these payments to Class Counsel in conformity with the terms of the Settlement  
8 Agreement.

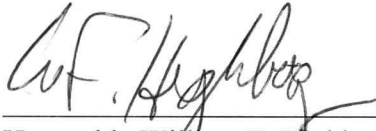
9 15. The Court orders that the Settlement Administrator shall be paid \$7,500.00 from  
10 the Gross Settlement Amount for all of its work done and to be done until the completion of this  
11 matter and finds that sum appropriate.

12 16. This document shall constitute a final judgment pursuant to California Rule of  
13 Court 3.769(h), which provides, "If the court approves the settlement agreement after the final  
14 approval hearing, the court must make and enter judgment. The judgment must include a  
15 provision for the retention of the court's jurisdiction over the parties to enforce the terms of the  
16 judgment. The court may not enter an order dismissing the action at the same time as, or after,  
17 entry of judgment." The Court will retain jurisdiction to enforce the Settlement and this Final  
18 Approval Order and Judgment.

19 17. The Settlement Administrator shall make a final report of the Settlement  
20 disbursement and Plaintiff shall file the report by April 15, 2022. The Court sets a ~~final~~  
21 ~~distribution hearing~~ for May 2, 2022, at ~~11:00 a.m.~~ in Department SSC10.

22 **IT IS SO ORDERED.**

23  
24 Dated: 12/16, 2020

25   
26 Honorable William F. Highberger  
27 Judge of the Superior Court  
28