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ATTORNEYS FOR PLAINTIFFS, RONALD LLOYD,
ETHAN PEARL AND THOSE SIMILARLY SITUATED

FILED
San Francisco County Superior Court

FEB 18 2022

CLERK OF THE COURT

BY:  Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO
UNLIMITED JURISDICTION**

RONALD LLOYD AND ETHAN PEARL,
INDIVIDUALLY AND ON BEHALF OF THOSE
SIMILARLY SITUATED,

PLAINTIFFS,

v.

WIPRO LIMITED, A FOREIGN
CORPORATION, AND DOES 1 THROUGH 10,
INCLUSIVE,

DEFENDANTS.

CASE No. CGC-20-584628

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 Plaintiff's Unopposed Motion for Preliminary Approval of Class Action
2 Settlement ("Motion") was heard by the Court at 9:30 a.m. on February 18, 2022 in
3 Department 302. Kevin Woodall appeared for Plaintiffs and Sean Piers appeared for
4 Defendant Wipro Limited. After reviewing the papers filed in support of said Motion
5 and arguments of counsel:

6 IT IS HEREBY ORDERED as follows:

7 1. The Court grants preliminary approval of the Settlement based upon the
8 terms set forth in the Class Action Settlement Agreement ("Settlement Agreement"),
9 attached to the Declaration of Kevin Woodall in Support of Plaintiff's Unopposed Motion
10 for Preliminary Approval of Class Action Settlement ("Woodall Declaration") as Exhibit
11 1 and submitted in support of this Motion. (Capitalized terms which are not defined in this
12 Order shall have the meaning ascribed to them in the Settlement Agreement.)

13 2. The Court finds the Settlement to be fair, adequate, and reasonable to the
14 Settlement Class. The Settlement falls within the range of reasonableness and appears to
15 be presumptively valid, subject only to any objections that may be raised at the Final
16 Approval Hearing.

17 3. A Final Approval Hearing on the separate questions of whether (i) the
18 proposed Settlement, (ii) the proposed award of attorneys' fees and costs to Class Counsel,
19 (iii) the proposed Plaintiffs' Service Awards and (iv) the proposed Settlement
20 Administrator's fees should be finally approved as fair, reasonable, and adequate as to the
21 members of the Settlement Class is scheduled for June 24, 2022 at 9:30 a.m., in Dept. 302
22 of the Superior Court of California, County of San Francisco. All briefs and materials in
23 support of an Order granting Final Approval of the Settlement, an Order granting Class
24 Counsel's attorneys' fees and costs, and an Order granting the Plaintiffs' Service Awards
25 shall be filed and served by May 24, 2022.

26 4. The Court approves, as to form and content, the Notice of Class Action
27 Settlement attached as Exhibit A to the Settlement Agreement, which was filed with the
28 Woodall Declaration in support of the Motion and is attached hereto. The Court approves

1 the procedure for Settlement Class Members to participate in, to opt out of, and to object
2 to the Settlement, as set forth in the Settlement Agreement and Notice of Class Action
3 Settlement.

4 5. The Court directs the mailing of the Notice of Class Action Settlement by
5 first-class mail and personal email (if available) to the Class Members in accordance with
6 the schedule set forth below. The Court finds the dates and process selected for the mailing
7 and distribution of the Notice of Class Action Settlement, as set forth in the schedule below
8 and the Settlement Agreement, meet the requirements of due process and provide the best
9 notice practicable under the circumstances and constitute constitutionally due and
10 sufficient notice to all persons entitled thereto.

11 6. The following Settlement Class is preliminarily certified for settlement
12 purposes only: "all current and former nonexempt employees from June 2, 2016 through
13 August 1, 2021, who do not timely request exclusion from the Settlement."

14 7. The Court conditionally appoints as Class Counsel for purposes of
15 settlement only: Kevin F. Woodall, Esq. of Woodall Law Offices.

16 8. The Court conditionally appoints as the Class Representative for purposes
17 of settlement only: Plaintiff Ethan Pearl.

18 9. The Court appoints Simpluris Class Action Settlement Administrators as
19 Settlement Administrator.

20 10. The Court orders the following schedule for further proceedings:

21 A. On or before March 6, 2022 (15 calendar days after Preliminary
22 Approval), Defendants shall provide to the Settlement Administrator in an electronic
23 format reasonably acceptable to the Settlement Administrator the Class Information that
24 identifies each prospective Settlement Class Member, his/her Social Security number, last-
25 known address, personal email addresses (if available), telephone numbers, the number of
26 pay periods worked by each Class Member from June 2, 2016 to August 1 2021, and
27 whether the individual is a former or current employee of Defendant.

1 B. On or before March 13, 2022 (7 calendar days after the Settlement
2 Administrator receives the Class Information from Defendant, the Settlement
3 Administrator shall run the addresses through a National Change of Address database and
4 transmit via regular United States First Class Mail and personal email (if available) the
5 Notice of Class Action Settlement to each prospective Settlement Class Member.

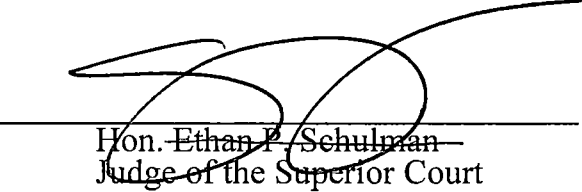
6 C. On or before May 12, 2022 (60 calendar days after the initial mailing
7 and emailing (if available) of the Class Notice), all opt-out requests must be postmarked or
8 emailed and returned to the Settlement Administrator, in compliance with the terms of the
9 Settlement Agreement and Notice of Class Action Settlement. Opt-out requests that do not
10 comply with this paragraph and the requirements set forth in the Settlement Agreement and
11 Notice of Class Action Settlement shall not be effective.

12 D. On or before May 12, 2022, (60 calendar days after the initial mailing
13 and emailing (if available) of the Class Notice), objections to the Settlement must be filed
14 with the Court and served on the Settlement Administrator, in compliance with the term of
15 the Settlement Agreement and Notice of Class Action Settlement. Objections that do not
16 comply with the requirements set forth in the Settlement Agreement and Notice of Class
17 Action Settlement shall not be considered.

18 11. If, for any reason, the Court does not execute and file an Order of Final
19 Approval, or if the Effective Date of the Settlement does not occur for any reason, the
20 Settlement Agreement and the proposed Settlement that is the subject of this Order, and all
21 evidence and proceedings had in conjunction therewith, shall be without prejudice to the
22 status quo ante rights of the Parties to the litigation, as more specifically set forth in the
23 Settlement Agreement.

1 12. This Court reserves the right to adjourn or continue this Settlement Hearing
2 from time to time without further notice to Class Members.

3
4
5 Dated: February 18, 2022



Hon. Ethan P. Schulman
Judge of the Superior Court
Suzanne Bolanos