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**F I L E D** Superior Court of California  
County of Butte  
OCT 05 2022  
Sharif Elmallah, Clerk  
B. [Signature] Deputy

Attorneys for Plaintiffs Robert Lawson and  
Marty Linebarger and Proposed Class Counsel

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Attorneys for Plaintiff Marcos Castro and the Class

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

ROBERT LAWSON, on behalf of himself  
and all "aggrieved employees" pursuant to  
Labor Code § 2698 *et seq.*,

Plaintiff,

v.

GRAPHIC PACKAGING  
INTERNATIONAL, LLC, a Delaware  
limited liability company, and DOES 1  
through 10, inclusive,

Defendants.

CASE NO: 20CV01921

*Assigned to the Honorable Stephen E. Benson,  
Dept. 6*

CLASS ACTION

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

**DATE: October 5, 2022**

**TIME: 9:00 a.m.**

**DEPT.: 6**

*Action Filed: September 29, 2020*

1           Plaintiffs' Motion for an Order Granting Final Approval of Class Action Settlement came  
2 before this Court on October 5, 2022. The above-captioned Action is a class action lawsuit brought  
3 by Plaintiffs Robert Lawson, Marty Linebarger, and Marcos Castro (together, "Plaintiffs") against  
4 Defendant Graphic Packaging International, LLC ("Defendant") (all together, the "Parties").  
5 Plaintiffs allege, on behalf of a class of certain of Defendant's current and former employees, that  
6 Defendant failed to pay all wages; failed to provide compliant meal or rest periods or compensation  
7 in lieu thereof; failed to reimburse business expenses; failed to comply with itemized wage  
8 statement provisions; and failed to timely pay wages due at separation. Defendant denies any and  
9 all alleged wrongdoing and denies any liability to Plaintiffs or to members of the Class. Defendant  
10 contends that that it has complied at all times with California law, including the California Labor  
11 Code, the Industrial Commission Wage Orders, and the California Business and Professions Code.

12           On June 8, 2022, this Court entered an Order Granting Preliminary Approval of Settlement,  
13 resulting in certification of the following provisional Settlement Class: all persons who are or were  
14 employed by Graphic Packaging International, LLC in the State of California as non-exempt  
15 employees who were paid wages at any time during the Settlement Period [April 27, 2017 to  
16 October 25, 2021].

17           That Preliminary Approval Order further directed the Parties to provide Notice to the Class,  
18 which informed absent class members of: (a) the proposed Settlement, and the Settlement's key  
19 terms; (b) the date, time and location of the Final Approval Hearing; (c) the right of any Class  
20 Member to object to the proposed Settlement, and an explanation of the procedures to exercise that  
21 right; (d) the right of any Class Member to exclude themselves from the proposed Settlement, and  
22 an explanation of the procedures to exercise that right; and (e) an explanation of the procedures for  
23 Class Members to participate in the proposed settlement.

24           The Court, upon Notice having been given as required in the Preliminary Approval Order,  
25 and having considered the Stipulation of Resolution (the "Settlement"), as well as all papers filed,  
26 hereby ORDERS, ADJUDGES AND DECREES AS FOLLOWS:  
27  
28

1           1.       This Court has jurisdiction over the subject matter of the Action and over all Parties  
2 to the Action, including all members of the Settlement Class.

3           2.       The Court finds that the Settlement Class is properly certified for settlement  
4 purposes only.

5           3.       The Notice provided to the Settlement Class conforms with the requirements of  
6 California Code of Civil Procedure section 382, California Civil Code section 1781, California  
7 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and any other  
8 applicable law, and constitutes the best notice practicable under the circumstances, by providing  
9 individual notice to all Class Members who could be identified through reasonable effort, and by  
10 providing due and adequate notice of the proceedings and of the matters set forth therein to the  
11 Class Members. The notice fully satisfied the requirements of due process.

12           4.       The Court finds the settlement was entered into in good faith, that the settlement is  
13 fair, reasonable and adequate, and that the settlement satisfies the standards and applicable  
14 requirements for final approval of this class action settlement under California law, including the  
15 provisions of California Code of Civil Procedure section 382 and California Rules of Court, Rule  
16 3.769.

17           5.       The Court approves the Settlement Amount of One Million Two Hundred Fifty  
18 Thousand Dollars (\$1,250,000).

19           6.       Zero (0) Class Members have objected to the terms of the Settlement.

20           7.       Zero (0) Class Members have requested exclusion from the Settlement.

21           8.       Upon entry of this Order and Judgment, compensation to the Class Members shall  
22 be affected pursuant to the terms of the Settlement.

23           9.       In addition to any recovery that Plaintiffs Robert Lawson, Marty Linebarger, and  
24 Marcos Castro may receive from the Net Settlement Amount, and in recognition of the Plaintiffs'  
25 efforts on behalf of the Settlement Class, the Court hereby approves the payment of Enhancement  
26 Payments to Plaintiffs Robert Lawson, Marty Linebarger, and Marcos Castro in the amount of Ten  
27 Thousand Dollars (\$10,000) each. This shall be paid from the Settlement Amount.  
28

1           10.     The Court approves the payment of attorneys' fees to Class Counsel in the sum of  
2     Four Hundred Thirty-Seven Thousand Dollars (\$437,000), and the reimbursement of litigation  
3     expenses in the sum of Sixteen Thousand Three Hundred Fifty-Nine Dollars and Twelve Cents  
4     (\$16,359.12). This shall be paid from the Settlement Amount.

5           11.     The Court approves and orders payment in the amount of Twenty Thousand Dollars  
6     (\$20,000) to ILYM Group, Inc. for performance of its settlement administration services. This  
7     shall be paid from the Settlement Amount.

8           12.     The Court approves the PAGA Payment and its apportionment among the Class  
9     Members, and orders payment in the amount of Ninety Thousand Dollars (\$90,000) to the  
10    California Labor and Workforce Development Agency for its 75% share of PAGA penalties; and  
11    Thirty Thousand Dollars (\$30,000) (or 25%) to be retained in the Net Settlement Amount for  
12    distribution to Class Members employed during the PAGA Period. This shall be paid from the  
13    Settlement Amount.

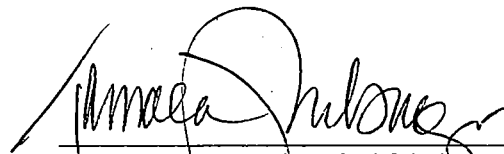
14          13.     Upon the entry of this Order and Judgment, Plaintiffs and all Class Members shall  
15    be bound by the releases of claims as set forth in the Settlement.

16          14.     This "Judgment" is intended to be a final disposition of the above captioned action  
17    in its entirety, and is intended to be immediately appealable.

18          15.     This Court shall retain jurisdiction with respect to all matters related to the  
19    administration and consummation of the Settlement, and any and all claims asserted in, arising out  
20    of, or related to the subject matter of the lawsuit, including but not limited to all matters related to  
21    the settlement and the determination of all controversies relating thereto.

22                 **IT IS SO ORDERED.**

23                 Dated: 10/5/2020

24                                   
25                                 JUDGE OF THE SUPERIOR COURT  
26                                 TAMARA L. MOSBARGER