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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

NOV 07 2024

BY 
VALERIE URUENA, DEPUTY

[Additional Counsel on Page 2]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

JAVIER QUINTERO, an individual; HARRY VALLES, an individual; HECTOR RIVERA, an individual; JOSHUA AGUILAR, an individual; JUAN GERARDO LOPEZ MACEDO, an individual; KEVIN FISHER, an individual; MADEL GRAGELOA, an individual; PEDRO CHAVEZ, an individual; and ULICES MARTINEZ, an individual; ALL INDIVIDUAL Plaintiffs ON BEHALF OF THEMSELVES AND ALL OTHER SIMILARLY SITUATED NON-EXEMPT CURRENT AND FORMER EMPLOYEES;

Plaintiffs,

vs.

HALIBURTON INTERNATIONAL FOODS, INC., a California Corporation; IAN CHARLES SCHENKEL, an individual; SQUARE ONE STAFFING, a California Corporation; and DOES 9 through 10, inclusive,

Defendants.

And consolidated action

Case No.: CIVDS1917709
Consolidated with CIVDS2018265

CLASS AND REPRESENTATIVE ACTION

[Hon. Jessica Morgan, Dept. S26]
Christian Towns

~~PROPOSED~~ JUDGMENT

[Filed with Plaintiffs' Notice of Motion and Memorandum of Points and Authorities, the Declaration of Kane Moon, the Declaration of Shoham Joseph Solouki, the Declarations of Plaintiffs, the Declaration of Yami Burns, and [Proposed] Final Approval Order]

FINAL APPROVAL HEARING:

Date: November 7, 2024
Time: 8:30 a.m.
Dept.: S26

Complaint Filed: June 14, 2019
Trial Date: Not set

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7 *Attorneys for Plaintiffs and the Proposed Class*

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2 **[PROPOSED] JUDGMENT**

3 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

4 On June 27, 2024, the Court entered an Order which granted Plaintiffs' Motion for
5 Preliminary Approval of Class Action Settlement, granted conditional class certification, approved
6 the format of the Class Notice, and set a Final Approval Hearing (the "Preliminary Approval Order"),
7 thereby preliminarily approving a settlement of the above-entitled action (the "Action") that was
8 reached between Plaintiffs Javier Quintero, Harry Valles, Hector Rivera, Joshua Aguilar, Juan
9 Gerardo Lopez Macedo, Kevin Fisher, Madel Grageola and Ruben Salazar ("Plaintiffs") and
10 Defendant Haliburton International Foods, Inc. ("Defendant") (together with Plaintiffs, the
11 "Parties"), in accordance with the Parties' Class Action and PAGA Settlement Agreement and Class
12 Notice (the "Settlement"). The Settlement was attached as **Exhibit 1** to the Declaration of Kane
13 Moon in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement that was
14 filed on June 4, 2024.

15 The Court has entered an Order granting final approval of the Parties' Settlement (the "Final
16 Approval Order"). The Court now has before it a [Proposed] Judgment.

17 The Court, having entered a Final Approval Order in this Action, and good cause appearing,

18 **HEREBY ADJUDGES AND DECREES AS FOLLOWS:**

19 1. The Court, for purposes of this Judgment, incorporates and adopts all terms and
20 definitions as set forth in the Settlement.

21 2. The Court enters Judgment as follows: Plaintiffs, Class Counsel, Aggrieved
22 Employees, the California Labor and Workforce Development Agency, and the Administrator shall
23 take nothing from Defendant except as expressly set forth in the Final Approval Order and according
24 to the terms of the Settlement.

25 3. The Parties shall bear their own respective attorneys' fees and costs, except as
26 otherwise provided for in the Settlement and approved by the Court.

27 4. This Judgment and the concurrently filed Final Approval Order are intended to be a
28 final disposition of the Action in its entirety and are intended to be immediately appealable.

1 5. Notwithstanding the finality of this Judgment, pursuant to California Code of Civil
2 Procedure section 664.6, the Court will retain jurisdiction over the Parties, Action, and the Settlement
3 solely for purposes of (i) enforcing the Settlement and/or Judgment, (ii) addressing settlement
4 administration matters, and (iii) addressing such post-Judgment matters as are permitted by law.

5 **IT IS SO ADJUDGED.**

6 DATE: 11.7.2024

C. Towns
THE HON. JESSICA MORGAN Christian Towns
Judge of the Superior Court, San Bernardino County