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Attorneys for Plaintiffs
STEPHEN CONTE, JESSICA SATTERFIELD,
and GABE NAPOLEON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

STEPHEN CONTE, individually and on
behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General; JESSICA SATTERFIELD,
individually and on behalf of others similarly
situated, and as an aggrieved employee and
Private Attorney General; and GABE
NAPOLEON, individually and on behalf of
others similarly situated, and as an aggrieved
employee and Private Attorney General;

Plaintiffs,

vs.

CLUTTER INC., a Delaware corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: CIVDS2020287

*Assigned for All Purposes to: Hon. David
Cohn, Dept. S-26*

**NOTICE OF ENTRY OF SECOND
AMENDED FINAL ORDER AND
JUDGMENT**

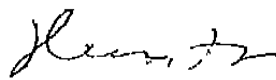
Action Filed: September 22, 2020
Trial Date: None Set

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

2 PLEASE TAKE NOTICE that on August 7, 2023, the Honorable David Cohn, in
3 Department S26 in the above-entitled Court, located at 247 West Third Street, San Bernardino,
4 California 92415, executed the Proposed Second Amended Final Order and Judgment Order.
5 Attached hereto as **Exhibit A** is a true and correct copy of the Order which was executed and
6 filed on August 7, 2023.

7
8 Dated: August 17, 2023

PROTECTION LAW GROUP, LLP

9
10 By: 

11 Heather Davis
12 Amir Nayebdadash
13 Priscilla Gamino
14 *Attorneys for Plaintiffs*
15 STEPHEN CONTE, JESSICA
16 SATTERFIELD and GABE NAPOLEON
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EXHIBIT A

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

STEPHEN CONTE, individually and on behalf
of others similarly situated, and as an aggrieved
employee and Private Attorney General;
JESSICA SATTERFIELD, individually and on
behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General; and GABE NAPOLEON, individually
and on behalf of others similarly situated, and
as an aggrieved employee and Private Attorney
General;

Plaintiffs,

vs.

CLUTTER INC., a Delaware corporation; and
DOES 1 through 50, inclusive.

Defendants.

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

AUG 07 2023

BY 
JESSICA MORALES, DEPUTY

Case No.: CIVDS2020287

*Assigned for All Purposes to: Hon. David
Cohn, Dept. S-26*

**[PROPOSED] SECOND AMENDED
FINAL ORDER AND JUDGMENT**

Complaint Filed: September 22, 2020
Trial Date: None Set

[PROPOSED] SECOND AMENDED FINAL ORDER AND JUDGMENT

File by Fax

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

2 The above-referenced Action having come before the Court on August 8, 2022, for a
3 hearing on Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement, and
4 consistent with the Court's Preliminary Approval Order and as set forth in the Joint Stipulation
5 of Class Action and PAGA Settlement attached to the Declaration of Heather Davis in Support
6 of Plaintiffs' Motion for Final Approval as Exhibit 1 ("Agreement" or "Settlement"), and due and
7 adequate notice having been given to all Class Members as required in the Preliminary Approval
8 Order, and the Court having considered all papers filed and proceedings had herein, and otherwise
9 being fully informed and good cause appearing therefore, and distribution of the Settlement
10 having been made pursuant to the Court's prior August 17, 2022 Amended Final Order and
11 Judgment it is hereby **ORDERED, ADJUDGED AND DECREED AS FOLLOWS:**

12 1. Pursuant to California law, this Court hereby affirms final approval of the
13 Agreement as previously entered on August 17, 2022.

14 2. The Court finds Defendant CLUTTER INC. ("Defendant") has funded
15 \$1,900,000.00 ("Maximum Settlement Amount") and all applicable employer-side payroll taxes
16 as directed in the Court's August 17, 2022 Amended Final Order and Judgment and in accordance
17 with the terms of the Agreement.

18 3. The Court finds Protection Law Group, LLP and Lawyers *for* Justice PC received
19 attorneys' fees in the amount of \$633,333.33 and attorneys' costs in the amount of \$20,018.07
20 from the Maximum Settlement Amount in accordance with the Court's August 17, 2022 Amended
21 Final Order and Judgment.

22 4. The Court finds the payments for Class Representative Enhancement Payments in
23 the amount of \$7,500.00 to Plaintiff Stephen Conte and Plaintiff Jessica Satterfield, and \$5,000.00
24 for Plaintiff Gabe Napoleon (total of \$20,000.00 for all three named Plaintiffs) from the
25 Maximum Settlement Amount were completed as set forth in the Agreement and the Court's
26 August 17, 2022 Amended Final Order and Judgment.

27 5. The Court finds payment in the amount of \$75,000.00 (75% of \$100,000.00) from
28 the Maximum Settlement Amount for PAGA penalties was made to the California Labor and

1 Workforce Development Agency and that the remaining \$25,000.00 (25% of \$100,000.00) was
2 distributed to the PAGA Group Members as set forth in the Agreement and the Court's August
3 17, 2022 Amended Final Order and Judgment.

4 6. The Court finds the payment to ILYM Group, Inc., in the amount of \$31,000.00
5 for the costs associated with settlement administration was made in accordance with the August
6 17, 2022 Amended Final Order and Judgment.

7 7. The Court finds the payment of individual settlement payments from the Net
8 Settlement Amount to the Participating Class Members was completed in accordance with the
9 August 17, 2022 Amended Final Order and Judgment.

10 8. The Court finds there were \$183,318.76 in unclaimed settlement funds at the
11 expiration of the 180-day check cashing period and directs the settlement administrator to
12 distribute these funds to the designated cy pres recipient, Legal Aid at Work, pursuant to
13 California Code of Civil Procedure § 384.

14 9. Without affecting the finality of this Judgment, the Court shall retain continuing
15 jurisdiction over this Action and the parties, including all Class Members, and over all matters
16 pertaining to the implementation and enforcement of the terms of the Agreement pursuant to
17 California Rule of Court 3.769(h) and California Code of Civil Procedure section 664.6. Except
18 as provided to the contrary herein, any disputes or controversies arising with respect to the
19 interpretation, enforcement, or implementation of the Agreement shall be presented to the Court.

20 **IT IS SO ORDERED. LET JUDGMENT BE ENTERED ACCORDINGLY.**

21
22 DATED: 8/7/23

23 
HON. DAVID COHN
JUDGE OF THE SUPERIOR COURT