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PLAINTIFF/PETITIONER: Yesenia Fierro, et al.
 DEFENDANT/RESPONDENT: 5.11 Inc., et al.

CASE NUMBER:
 30-2020-01171395-CU-OE-CXC

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is *(specify)*:
****PLEASE SEE ATTACHED PROOF OF SERVICE****

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and *(check one)*:

- a. ☐ deposited the sealed envelope with the United States Postal Service.
 b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on *(date)*:
 b. from *(city and state)*:

4. The envelope was addressed and mailed as follows:

- a. Name of person served:

Street address:

City:

State and zip code:

- b. Name of person served:

Street address:

City:

State and zip code:

- c. Name of person served:

Street address:

City:

State and zip code:

- d. Name of person served:

Street address:

City:

State and zip code:

☐ Names and addresses of additional persons served are attached. *(You may use form POS-030(P).)*

5. Number of pages attached:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: July 22, 2026

Deven Launchbaugh

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

EXHIBIT 1

LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
Meg Razi (SBN 237184)
LAWYERS for JUSTICE, PC
450 N. Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

YESENIA FIERRO and CHERISE MORRIS
EASTMAN, individually, and on behalf of other
members of the general public similarly situated
and on behalf of the State of California pursuant to
the California Private Attorneys General Act;

Plaintiffs,

vs.

5.11, INC., a California corporation; 5.11
TACTICAL, INC., an unknown business entity;
5.11 TACTICAL, an unknown business entity; and
DOES I through 100, inclusive,

Defendants.

Case No. 30-2020-01171395-CU-OE-CXC

Assigned for All Purposes to:

Honorable Layne H. Melzer
Department CX102

CLASS ACTION

**[PROPOSED] FURTHER REVISED
ORDER OF FINAL APPROVAL AND
JUDGMENT**

Complaint Filed: November 20, 2020
FAC Filed: January 18, 2023
Trial Date: None Set

1 The above-referenced action (“Action”) was commenced as follows:

2 On November 20, 2020, Plaintiff Yesenia Fierro (“Plaintiff”) filed the Action, a class and
3 PAGA representative action, in the Superior Court of the State of California for the County of
4 Orange, on behalf of herself, a putative class of non-exempt employees, and on behalf of the State
5 of California as a private attorney general with respect to all “Aggrieved employees: pursuant to
6 California Labor Code §2698. In the Action, Plaintiff sought to recover for alleged violations of
7 the California Labor Code and Industrial Commission Wage Orders for Defendant’s alleged
8 failure to pay all wages due, failure to provide compliant meal periods and associated premiums,
9 failure to provide compliant rest periods and associated premiums, failure to timely pay wages
10 upon termination, failure to timely pay wages during employment, failure to provide complete
11 and accurate wage statements, failure to keep requisite payroll records, failure to reimburse
12 business expenses, violation of UCL, and penalties under of California Labor Code § 2698, et
13 seq. On January 18, 2023, Plaintiff Fierro filed the First Amended Complaint, adding Cherise
14 Morris Eastman as a plaintiff.

15 On May 6, 2025, the Court entered the Revised Final Approval Order and Judgment,
16 thereby granting final approval of the Action reached by Plaintiffs and Defendant, in accordance
17 with the First Amended Class and Representative Action Settlement Agreement and Release of
18 Claims (“Settlement,” “Agreement” or Settlement Agreement”), which together with the exhibits
19 annexed thereto, set forth the terms and conditions for the settlement of the Action.

20 The Declaration of Garvin Brown of ILYM Group, Inc., Regarding Disbursement of
21 Settlement Funds (“Brown Declaration”) was submitted to the Court for filing in the Action on
22 February 9, 2026.

23 The total amount received under the Settlement was \$806,185.85, which included the
24 Gross Settlement Amount of \$785,000.00, plus the employer’s share of the applicable payroll
25 taxes in the amount of \$21,185.85 (Brown Declaration, ¶4).

26 On June 5, 2025, ILYM Group issued and mailed checks from the QSF to each Settlement
27 Class Member and PAGA Aggrieved Employee (totaling \$395,606.46; including the total of
28 \$37,500.00 which was paid to the PAGA Aggrieved Employees); Class Counsel Attorneys’ Fees

1 to Lawyers for Justice, PC (in the amount of \$235,500.00), Class Counsel Attorneys' Costs to
2 Lawyers for Justice, PC (in the amount of \$20,393.54), Class Representative Service Award to
3 Yesenia Fierro (in the amount of \$5,000.00), Class Representative Service Award to Cherise
4 Morris Eastman (in the amount of \$5,000.00), LWDA Payment to the LWDA (in the amount of
5 \$112,500.00); Administrative Costs to ILYM Group (in the amount of \$11,000.00), and
6 Employer's portion of applicable payroll taxes on the "wages portion" of the Individual
7 Settlement Payments (in the amount of \$21,185.85)(*Id.*).

8 On June 5, 2025, payment to the Internal Revenue Service, for all applicable Federal
9 payroll taxes, in the amount of \$51,681.53, was completed (*Id.* at ¶12).

10 On June 5, 2025, payment to the Employment Development Department, for all
11 applicable State payroll taxes in the amount of \$14,203.47, was completed (*Id.* at ¶13).

12 The deadline for the Settlement Class Members / PAGA Aggrieved Employees to
13 cash their settlement checks was **December 2, 2025**; (i.e., 180 calendar days after their issuance)
14 (*Id.* at ¶14).

15 As of January 26, 2026, two hundred ninety-two (292) checks were not cashed,
16 deposited, or otherwise negotiated. The funds associated with said checks totaled **\$54,293.61** (*Id.*
17 at ¶15).

18 Pursuant to the terms of the Parties' Settlement Agreement, the total associated with
19 the checks that were not cashed, deposited, or otherwise negotiated, after the check-cashing
20 deadline, shall be sent to the *cy pres* recipient, Legal Aid at Work (*Id.* at ¶16).

21 The Declaration of Kevin Clune of Legal Aid at Work ("Clune Declaration") was
22 filed concurrently with this document.

23 **Purpose of Distribution:** Legal Aid at Work is a nonprofit organization providing
24 civil legal services to the indigent consistent with California Code of Civil Procedure Section 384.
25 For over 100 years, Legal Aid at Work has provided continuous service with the aim of offering
26 free and high-quality legal assistance to those who are unable to afford legal representation. For
27 more than five decades, Legal Aid at Work has primarily devoted its resources to protecting the
28 workplace rights of California's low-wage workers. Legal Aid at Work's nonprofit status and

work providing services to the indigent make it an appropriate designee of *cy pres* funds. Legal Aid at Work is a CCP § 384 organization...(Clune Declaration, ¶3).

How Legal Aid at Work plans to expend the funds received: If awarded *cy pres* monies in this case, Legal Aid at Work will use the funds to advance purpose of the Plaintiffs and class members by using the tools and strategies set forth in this declaration, to protect, enforce and strengthen the rights of workers to be paid the monies they rightfully earn (*Id.* ¶29).

THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS:

1. The Court's May 6, 2025, Revised Final Approval Order is hereby incorporated by reference into this Amendment to Revised Final Approval Order and Judgment.

2. The payment in the amount of \$54,293.61, representing the funds associated with the two hundred ninety-two (292) settlement checks that were not cashed, deposited, or otherwise negotiated after the check-cashing deadline of December 2, 2025, to Legal Aid at Work, is approved.

3. After entry of this Further Revised Order of Final Approval and Judgment, pursuant to California Code of Civil Procedure, Plaintiff shall submit this Order to the Judicial Council.

4. Upon the entry of this Order/Compliance hearing of July 23, 2026, the Action shall be closed.

July 06, 2026
Dated: _____



Honorable Layne H. Melzer
Judge of the Orange Superior Court

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 450 N. Brand Blvd., Suite 900, Glendale, California 91203.

On July 22, 2026, I served the foregoing document(s) described as **NOTICE OF ENTRY OF JUDGMENT OR ORDER** on interested parties in this action as follows:

Michael J. Burns (mburns@seyfarth.com)
Andrew M. McNaught (amcnaught@seyfarth.com)
Heather E. Horn (hhorn@seyfarth.com)

SEYFARTH SHAW LLP
560 Mission Street, 31st Floor
San Francisco, California 94105

Attorneys for Defendant 5.11, INC

Chair, Judicial Council of California
(Civil Case Coordination)
455 Golden Gate Avenue, 5th Floor
San Francisco, California 94102-3688
Email: coordination@jud.ca.gov, jason.haas@jud.ca.gov

[X] BY E-MAIL

The above-referenced document(s) was transmitted to the person(s) at the e-mail address(es) listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency Web URL:
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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1 **[X] STATE**

2 I declare under penalty of perjury under the laws of the State of California that the above
3 is true and correct.

4 Executed on July 22, 2026, at Glendale, California.

5 

6 Deven Launchbaugh