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

ROBERT HARLOW, JR., individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

MARY ALFARDI, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an Illinois limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 20-CIV-03986
(Consolidated with Case Nos. 23-CIV-05656
and 20-CIV05141)

Honorable Nancy L. Fineman
Department 4

CLASS ACTION

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES AND COSTS,
SETTLEMENT ADMINISTRATION
COSTS, AND ENHANCEMENT AWARDS**

Date: September 17, 2024
Time: 2:00 p.m.
Department: 4

Complaint Filed: September 16, 2020
Trial Date: None Set

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ROBERT HARLOW, JR., individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

1 This matter has come before the Honorable Nancy L. Fineman in Department 4 of the
2 above-entitled Court, located at 800 N. Humboldt Street, San Mateo, California 94401, on
3 Plaintiffs Robert Harlow, Jr. and Mary Alfardi's (together, "Plaintiffs") Motion for Attorneys'
4 Fees and Costs, Settlement Administration Costs, and Enhancement Awards. Lawyers *for* Justice,
5 PC and Aequitas Legal Group, APC appeared on behalf of Plaintiffs, and Fisher & Phillips LLP
6 appeared on behalf of Defendant Covenant Aviation Security, LLC ("Defendant").

7 On April 3, 2024, the Court entered the Order Granting Preliminary Approval of Class
8 Action Settlement ("Preliminary Approval Order"), thereby preliminarily approving the settlement
9 of the above-entitled actions ("Actions") in accordance with the Class Action and PAGA
10 Settlement Agreement and Stipulation to Amend and Modify the Class Action and PAGA
11 Settlement Agreement (together, "Settlement," "Agreement," or "Settlement Agreement"), which,
12 together with the exhibits annexed thereto set forth the terms and conditions for settlement of the
13 Actions.

14 Having reviewed the Settlement Agreement and duly considered the parties' papers and
15 oral argument, and good cause appearing,

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

17 1. This Order incorporates by reference the definitions in the Settlement Agreement,
18 and all capitalized terms used, but not defined herein, shall have the same meanings as in the
19 Settlement Agreement.

20 2. This Court has jurisdiction over the claims of the Class Members asserted in this
21 proceeding and over all parties to the Actions.

22 3. The Court finds that payment of Settlement Administration Costs in the amount of
23 \$28,894.10 is appropriate for the services performed and costs incurred and to be incurred for the
24 notice and settlement administration process. It is hereby ordered that the Settlement
25 Administrator, Phoenix Settlement Administrators, shall issue payment to itself in the amount of
26 \$28,894.10, in accordance with the terms and methodology set forth in the Agreement.

27 4. The Court finds that the Enhancement Awards sought are fair and reasonable for
28 the work performed by Plaintiffs on behalf of the Class. It is hereby ordered that the Settlement

1 Administrator issue payment in the amount of \$12,500.00 each to Plaintiffs for their Enhancement
2 Awards, according to the terms and methodology set forth in the Agreement.

3 5. The Court finds that the requested Attorneys' Fees in the amount of \$2,000,000.00
4 to Class Counsel falls within the range of reasonableness, and the results achieved justify the award
5 sought. The requested attorneys' fees to Class Counsel are fair, reasonable, and appropriate, and
6 are hereby approved. It is hereby ordered that the Settlement Administrator issue payment in the
7 amount of \$2,000,000.00 to Class Counsel for attorneys' fees, in accordance with the terms and
8 methodology set forth in the Agreement, as follows: \$1,000,000.00 to Lawyers *for* Justice, PC and
9 \$1,000,000.00 to Aequitas Legal Group, APC.

10 6. The Court finds that the requested litigation costs and expenses of \$28,047.02 to
11 Class Counsel is reasonable, and hereby approved. It is hereby ordered that the Settlement
12 Administrator issue payment in the amount of \$28,047.02 to Class Counsel for reimbursement of
13 litigation costs and expenses, in accordance with the terms and methodology set forth in the
14 Agreement, as follows: \$20,407.99 to Lawyers *for* Justice, PC and \$7,639.03 to Aequitas Legal
15 Group, APC.

16 7. It is hereby ordered that within seven (7) calendar days of the funding of the Total
17 Settlement Amount, the Settlement Administrator will issue Enhancement Awards to Plaintiffs,
18 Attorneys' Fees and Costs to Class Counsel, and Settlement Administration Costs to itself, in
19 accordance with the terms and methodology set forth in the Agreement.

20 8. After entry of this Order, pursuant to California Rules of Court, Rule 3.769(h), the
21 Court shall retain jurisdiction to construe, interpret, implement, and enforce the Settlement
22 Agreement and Order, to hear and resolve any contested challenge to a claim for settlement
23 benefits, and to supervise and adjudicate any dispute arising from or in connection with the
24 distribution of settlement benefits.

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1 9. Notice of entry of this Order shall be given to the Settlement Class Members and
2 Aggrieved Employees by posting a copy on the Settlement Administrator's website for a period
3 of at least sixty (60) calendar days after the date of entry of this Order. Individualized notice is not
4 required.

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6 Dated: _____

Honorable Nancy L. Fineman
Judge of the Superior Court