

PLAINTIFF/PETITIONER: Robert Lawson, et al.	CASE NUMBER: 20CV01921
DEFENDANT/RESPONDENT: Graphic Packaging International, LLC, et al.	

**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*): 4550 East Thousand Oaks Boulevard, Suite 100, Westlake Village, CA 91362.

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*): 10/05/2022
- b. from (*city and state*): Westlake Village, CA

4. The envelope was addressed and mailed as follows:

a. Name of person served:

Danielle Hultenius Moore, Esq. FISHER & PHILLIPS LLP

Street address: 4747 Executive Drive, Suite 1000

City: San Diego

State and zip code: CA 92121

c. Name of person served:

William L. Marder, Esq. POLARIS LAW GROUP LLP

Street address: 501 San Benito Street, Suite 200

City: Hollister

State and zip code: CA 95023

b. Name of person served:

Larry W. Lee, Esq., DIVERSITY LAW GROUP, P.C.

Street address: 515 S. Figueroa Street, Suite 1250

City: Los Angeles

State and zip code: CA 90071

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 4.

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

Date: 10/05/2022

Jeremy Reyes

(TYPE OR PRINT NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)



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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

F I L E D Superior Court of California
County of Butte
OCT 05 2022
Sharif Elmallah, Clerk
Deputy

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
24 Dated: 10/5/2022

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