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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE, CIVIL COMPLEX CENTER

Coordination Proceeding Special Title (Rule
3.550)

**INTER-CON SECURITY SYSTEMS
WAGE AND HOUR CASES**

Included actions:

Stewart v. Inter-Con Security Systems, Inc.
No. 19STCV31142

Barrow v. Inter-Con Security Systems, Inc.
No. 19STCV34155

Young v. Inter-Con Security Systems, Inc.
No. 19STCV39442

Laliberte v. Inter-Con Security Systems, Inc.
No. 20STCV15080

Woodard v. Inter-Con Security Systems, Inc.
No. 21GDCV00059

Robinson v. Inter-Con Security Systems, Inc.
No. 19CV358006

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5200

Assigned to the Hon. William D. Cluster

**~~[AMENDED PROPOSED]~~ ORDER
GRANTING MOTION FOR COURT
APPROVAL OF THE PARTIES' PAGA
SETTLEMENT AND JUDGMENT**

Date: November 8, 2024
Time: 9:00 a.m.
Place: Department CX101

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1 finding of the validity of any allegations or of any wrongdoing by Defendant. Neither this Order and
2 Judgment, the Settlement, nor any document referred to herein, nor any action taken to carry out the
3 Settlement, may be construed as, or may be used as, an admission of any fault, wrongdoing, omission,
4 concession, or liability whatsoever by or against Defendant.

5 8. The Court approves the gross settlement amount of \$3,200,000. After deducting the
6 approved amounts for attorneys' fees and costs, Plaintiffs' individual settlement payments, and
7 settlement administration costs, the net settlement amount of \$2,125,091.73 will be allocated as follows:
8 Seventy-Five Percent (75%), or approximately \$1,593,818.80, shall be paid to the California Labor and
9 Workforce Development Agency, and the remaining Twenty-Five Percent (25%), or approximately
10 \$531,272.93, shall be paid to Aggrieved Employees.

11 9. The Court hereby awards a combined total of \$960,000 in attorneys' fees and
12 \$33,908.27 costs to Plaintiffs' Counsel, to be divided between counsel according to the terms of their fee
13 and cost sharing agreement.

14 10. The Court approves individual settlement payments of \$7,500, each, to Renata Stewart,
15 Ousbea Barrow, Tyler Laliberte, Kareli Vasquez, Brianna Woodard, and Greg Young.

16 11. The Court appoints CPT Group, Inc. to serve as the Settlement Administrator, and
17 approves Settlement Administration Costs of \$36,000.

18 12. This Judgment shall be binding on all Aggrieved Employees and the State of California,
19 who are hereby barred by the doctrine of res judicata from re-litigating the Released Claims during the
20 Release Period, as those terms are defined by the Settlement. *See Arias v. Superior Court*, 46 Cal. 4th
21 969, 986 (2009) (holding that a judgment in a representative action brought by an aggrieved employee
22 under PAGA is binding not only on the named employee plaintiff but also on state labor law
23 enforcement agencies and any aggrieved employee not a party to the proceeding).

24 13. Without affecting the finality of the Order and Judgment, the Court shall retain exclusive
25 and continuing jurisdiction under California Code of Civil Procedure § 664.6, over the above-captioned
26 action and the parties for purposes of enforcing the terms of the Judgment and the Settlement.

27 14. This document shall constitute a judgment under California Code of Civil Procedure §
28 664.6.

1 15. Pursuant to CCP § 384(b), Plaintiffs shall submit to the Court a report on or before
2 February 1, 2026, confirming that settlement funding is proceeding per the installment plan, the total
3 amount deposited as of the date of the report, and the anticipated date of full funding. Upon receiving the
4 report, the Court will determine whether further reports and/or a hearing will be necessary.
5

6 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**
7

8
9 Date 11/12/2024



HON. WILLIAM D. CLASTER
Orange County Superior Court Judge

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3 **PROOF OF SERVICE**

4 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and
5 not a party to the within suit; my business address is 1875 Century Park East, Suite 1000, Los
6 Angeles, California 90067.

7 On **November 8, 2024**, I served the document(s) described as: **[AMENDED
8 PROPOSED] ORDER GRANTING MOTION FOR COURT APPROVAL OF THE
9 PARTIES' PAGA SETTLEMENT AND JUDGMENT** on the interested parties in this action
10 by sending [] the original [✓] a true copy thereof [✓] to interested parties as follows [or] []
11 as stated on the attached service list:

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15 **[X] BY ELECTRONIC SERVICE:** I caused the document(s) to be transmitted
16 electronically via One Legal eService to the individuals listed above, as they exist on
17 that database. This will constitute service of the document(s).

18 Executed on **November 8, 2024**, at Los Angeles, California.

19 Xochitl Tapia

Type or Print Name

Signature 