

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
Tel: (213) 488-6555
Fax: (213) 488-6554

William L. Marder, Esq. (State Bar No. 170131)
POLARIS LAW GROUP
501 San Benito Street, Suite 200
Hollister, CA 95023
Tel: (831) 531-4214
Fax: (831) 634-0333

Attorneys for Plaintiff and the Class

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

RAKESH RAY, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

C&W FACILITY SERVICES, INC.,
Massachusetts corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2101321

[Assigned for all purposes to the Hon. David Cohn,
Department S-26]

[PROPOSED] AMENDED JUDGMENT

Complaint Filed: January 28, 2021
FAC Filed: April 22, 2021
SAC Filed: October 1, 2021

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO CIVIL DIVISION
JUN 30 2023
BY *[Signature]*
VERONICA GONZALEZ, DEPUTY

[PROPOSED] AMENDED JUDGMENT

1 On April 6, 2022, the above-entitled Court granted final approval of the class action settlement
2 and entered its Order Granting Plaintiff's Motion For Final Approval of Class Action Settlement (the
3 "Final Approval Order").

4 Accordingly, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

5 1. Pursuant to Code of Civil Procedure section 664.6 and Rule 3.769(h) of the California
6 Rules of Court, the Court reserves exclusive and continuing jurisdiction over this Action, the Parties
7 and the Class Members for the purposes of supervising:

8 a. The implementation, enforcement, construction, and interpretation of the
9 Settlement, the Order Granting Preliminary Approval of Class Action Settlement entered on
10 December 29, 2021, the plan of allocation, the Final Approval Order, and the Judgment; and

11 b. Distribution of amounts paid under this Settlement as set forth in the Joint
12 Stipulation of Class Action Settlement and Release ("Stipulation" or "Settlement Agreement").

13 2. The "Settlement Class" or "Class Members" is comprised of and defined as:

14 a. All current and former employees of Defendant in the State of California who
15 received wages at any time between January 12, 2020, through February 14, 2021 and received paper
16 copy wage statements.

17 3. Plaintiff Rakesh Ray ("Plaintiff") and the members of the Settlement Class shall take
18 from their Complaint only the relief set forth in (a) Settlement Agreement; (b) the Final Approval
19 Order filed on April 6, 2022.

20 4. Plaintiff and all Class Members who have not submitted a valid and timely Request
21 for Exclusion shall be deemed conclusively to have made the releases set forth in the Settlement
22 Agreement, which shall have the force and effect of res judicata.

23 5. The Court awards the following: (1) \$50,000.00 for attorneys' fees; (2) \$2,808.97 in
24 attorney costs; (3) \$15,000.00 to Plaintiff as the class representative for an enhancement award; (4)
25 \$10,000.00 for claims administration costs; and (5) \$7,500.00 to the Labor and Workforce
26 Development Agency.

27 6. Pursuant to Code of Civil Procedure § 384 and the declaration of Jarrod Salinas filed
28 on April 20, 2023, to date there are a total of thirty-six (36) uncashed individual settlement payment

1 checks totaling \$6,609.80. Pursuant to the Settlement Agreement, funds from these uncashed checks
2 will be remitted to Legal Aid at Work. The Court hereby orders the Parties to implement the terms
3 of the Settlement Agreement, including remitting the uncashed funds from individual settlement
4 payment checks to Legal Aid at Work.

5 7. The Clerk is hereby directed to close this case.

6
7 IT IS SO ORDERED AND ADJUDGED.

8
9
10 DATED: _____

JUN 30 2023

JOSEPH T. ORTIZ

HON. DAVID COHN
SUPERIOR COURT OF CALIFORNIA

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8
9
10
11
12
13
14
15
16
17
18

2
3
4
5
6
7
8

4
5
6
7
8