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Attorneys for Plaintiff Zohra Jayaraman  
and Proposed Class Counsel

**FILED**  
ALAMEDA COUNTY

SEP 08 2023

CLERK OF THE SUPERIOR COURT  
By  Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA**

ZOHRA JAYARAMAN, on behalf of  
herself and all "aggrieved employees"  
pursuant to Labor Code § 2698 *et seq.*,

Plaintiff,

v.

AMETHOD PUBLIC SCHOOLS, a  
California corporation, and DOES 1  
through 10, inclusive,

Defendants.

CASE NO: RG21105927

*Assigned to the Hon. Brad Seligman, Dept. 23*

**CLASS ACTION**

**[AMENDED PROPOSED] ORDER AND  
JUDGMENT GRANTING FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**DATE: September 12, 2023  
TIME: 3:00 p.m.  
DEPT.: 23**

**Reservation No. A-21105927-002**

*Action Filed: June 3, 2021*

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**RECITALS**

WHEREAS, Plaintiff Zohra Jayaraman's ("Plaintiff" or "Jayaraman") Motion for an Order Granting Final Approval of Class Action Settlement came before this Court on September 12, 2023 at 3:00 p.m.

WHEREAS, the above-captioned Action is a class action lawsuit brought by Plaintiff against Defendant Amethod Public Schools ("Defendant") (all together, the "Parties").

WHEREAS, Plaintiff alleges, on behalf of a class of certain of Defendant's current and former employees, that Defendant failed to pay all wages, failed to provide meal and rest periods or compensation in lieu thereof, failed to pay wages due timely during and upon separation of employment, failed to reimburse expenses, and failed to comply with itemized wage statement provisions.

WHEREAS, Defendant denies any and all alleged wrongdoing and denies any liability to Plaintiff or to members of the Class. Defendant contends that that it has complied at all times with California law, including the California Labor Code, the Industrial Commission Wage Orders, and the California Business and Professions Code.

WHEREAS, on May 26, 2023, this Court entered an Order Granting Preliminary Approval of Settlement, resulting in certification of the following provisional Settlement Class: all persons who are or were previously employed (1) in California; (2) by Defendant (3) as non-exempt employees; and (4) at any point from June 3, 2017 through August 15, 2022.

WHEREAS, that Order further directed the Parties to provide Notice to the Class, which informed absent class members of: (a) the proposed Settlement, and the Settlement's key terms; (b) the date, time and location of the Final Approval Hearing; (c) the right of any Class Member to object to the proposed Settlement, and an explanation of the procedures to exercise that right; (d) the right of any Class Member to exclude themselves from the proposed Settlement, and an explanation of the procedures to exercise that right; and (e) an explanation of the procedures for Class Members to participate in the proposed settlement.

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**FINDINGS**

The Court, upon Notice having been given as required in the Preliminary Approval Order, and having considered the First Amended Settlement Agreement and Release of Claims (the "Settlement"), as well as all papers filed, hereby ORDERS, ADJUDGES AND DECREES AS FOLLOWS:

1. This Court has jurisdiction over the subject matter of the Action and over all Parties to the Action, including all members of the Settlement Class and the PAGA Group.

2. The Court finds that the Settlement Class is properly certified for settlement purposes only.

3. The Notice provided to the Settlement Class conforms with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and any other applicable law, and constitutes the best notice practicable under the circumstances, by providing individual notice to all Class Members who could be identified through reasonable effort, and by providing due and adequate notice of the proceedings and of the matters set forth therein to the Class Members. The notice fully satisfied the requirements of due process.

4. The Court finds the settlement was entered into in good faith, that the settlement is fair, reasonable and adequate, and that the settlement satisfies the standards and applicable requirements for final approval of this class action settlement under California law, including the provisions of California Code of Civil Procedure section 382 and California Rules of Court, Rule 3.769.

5. Zero (0) Class Members have objected to the terms of the Settlement.

6. Zero (0) Class Members have requested exclusion from the Settlement.

**ORDER AND JUDGMENT**

7. The Court approves the Maximum Settlement Amount of Five Hundred Sixty Thousand Dollars (\$560,000.00).

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1           8.       Upon entry of this Order, compensation to the Class Members and the PAGA Group  
2 shall be affected pursuant to the terms of the Settlement.

3           9.       In addition to any recovery that Plaintiff may receive from the Net Settlement  
4 Proceeds, and in recognition of the Plaintiff's efforts on behalf of the Settlement Class, the Court  
5 hereby approves the payment of an Enhancement Payment to Plaintiff Zohra Jayaraman in the  
6 amount of Five Thousand Dollars (\$5,000.00). This shall be paid from the Maximum Settlement  
7 Amount.

8           10.      The Court approves the payment of attorneys' fees to Class Counsel in the sum of  
9 One Hundred Eighty-Six Thousand Six Hundred Sixty-Six Dollars and sixty-six cents  
10 (\$186,666.66), and the reimbursement of litigation expenses in the sum of Twelve Thousand Four  
11 Hundred Thirty-Seven Dollars and Forty-Two Cents (\$12,437.42). This shall be paid from the  
12 Maximum Settlement Amount.

13           11.      The Court approves and orders payment in the amount of Twelve Thousand Dollars  
14 (\$12,000.00) to Phoenix Settlement Administrators for performance of its settlement administration  
15 services. This shall be paid from the Maximum Settlement Amount.

16           12.      The Court approves and orders payment in the amount of Thirty Thousand Dollars  
17 (\$30,000.00) to the California Labor and Workforce Development Agency for its 75% share of  
18 PAGA penalties. This shall be paid from the Maximum Settlement Amount.

19           13.      Upon the entry of this Order and Judgment, Plaintiff, PAGA Group members, and  
20 all Class Members who did not exclude themselves from the Settlement shall be bound by the  
21 release of claims as set forth in the Settlement.

22           14.      The Court ORDERS that 10% of the fee award (\$18,666.66) shall be kept by the  
23 Settlement Administrator until the completion of the distribution process and Court approval of a  
24 final accounting and entry of an amended judgment pursuant to Code of Civil Procedure section  
25 384. The Settlement Administrator shall not release these funds to Class Counsel until the Court  
26 determines that these conditions have been met.

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15. The Court hereby sets a compliance hearing for May 12, 2026, at 3:00 p.m., in Department 23, at which time the Court will consider evidence that the distribution process is complete and that a final accounting may be approved and an amended judgment entered. Counsel shall submit a proposed amended judgment compliant with CCP 384 and evidence supporting the parties' compliance with the terms of the Agreement no later than ten calendar days prior to the compliance hearing.

16. This "Judgment" is intended to be a final disposition of the above captioned action in its entirety, and is intended to be immediately appealable.

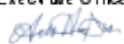
17. This Court shall retain jurisdiction with respect to all matters related to the administration and consummation of the Settlement, and any and all claims, asserted in, arising out of, or related to the subject matter of the lawsuit, including but not limited to all matters related to the settlement and the determination of all controversies relating thereto. ✓

**IT IS SO ORDERED.**

Dated:

9/8/23

JUDGE OF THE SUPERIOR COURT

|                                                                                             |  |                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SUPERIOR COURT OF CALIFORNIA<br/>COUNTY OF ALAMEDA</b>                                   |  | Reserved for Clerk's File Stamp                                                                                                                                                                                                                      |
| COURTHOUSE ADDRESS:<br>Rene C. Davidson Courthouse<br>1225 Fallon Street, Oakland, CA 94612 |  | <b>FILED</b><br>Superior Court of California<br>County of Alameda<br>09/21/2023<br>Chad Finke, Executive Officer / Clerk of the Court<br>By:  Deputy<br>A. Hewitt |
| PLAINTIFF/PETITIONER:<br>Zohra Jayaraman                                                    |  |                                                                                                                                                                                                                                                      |
| DEFENDANT/RESPONDENT:<br>Amethod Public Schools                                             |  |                                                                                                                                                                                                                                                      |
| <b>CERTIFICATE OF MAILING</b>                                                               |  | CASE NUMBER:<br>RG21105927                                                                                                                                                                                                                           |

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the attached document upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Oakland, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

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Dated: 09/21/2023

Chad Finke, Executive Officer / Clerk of the Court

By:



A. Hewitt, Deputy Clerk

**CERTIFICATE OF MAILING**