

MAY 23 2025

Clerk of the Superior Court
By: A. Yim, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

Archie Shakespeare and Tyon Hood, as
individuals, on behalf of themselves and all others
similarly situated and as private attorneys general
pursuant to the Private Attorneys General Act,

Plaintiffs,

vs.

National Steel and Shipbuilding Company, and
Does 1 through 10,

Defendants.

Case No. 37-2021-00013962-CU-OE-CTL
CLASS ACTION
(Assigned to the Hon. Katherine Bacal – Dept.
C-63)

~~Proposed~~ Final Order and Judgment
Approving Class Action Settlement

The hearing on the Motion for Final Approval was held on May 23, 2025 at 1:30 p.m. in
Department C-63 before the Honorable Katherine Bacal of the Superior Court of the State of California,
County of San Diego, located at 330 W Broadway, San Diego, California 92101. Lonnie C. Blanchard III
of the Blanchard Law Group, APC appeared as Class Counsel for the Representative Plaintiffs and
Evan Peña of Quarles & Brady LLP appeared on behalf of Defendant National Steel and
Shipbuilding Company.

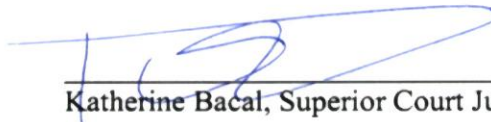
1 The Court, having reviewed all pleadings, records, and other documentation on file in this case,
2 including the papers filed in support of final approval of Settlement and oral argument of counsel, and
3 good cause appearing therefor, orders as follows:

- 4 1. This Final Judgment Approving Class Action Settlement (“Judgment”) incorporates by reference
5 the definitions in the Settlement and Release Agreement and Amendment (“Settlement”) filed as
6 Exhibit 1 to the Declaration of Peter R. Dion-Kindem in support of the Motion for Preliminary
7 Approval of Class Action Settlement.
- 8 2. The Court approves the Settlement and finds that it is fair, reasonable, and adequate.
- 9 3. The Court approves the attorney’s fees requested by Class Counsel and orders the payment of
10 \$955,305 as reasonable attorney’s fees to Class Counsel in accordance with the Settlement.
- 11 4. The Court finds that the costs incurred by Class Counsel are reasonable and orders the payment of
12 the following costs in accordance with the Settlement:
 - 13 a. To Peter R. Dion-Kindem, P.C. the sum of \$4,983.40;
 - 14 b. To the Blanchard Law Group, APC the sum of \$3,600.00;
 - 15 c. To the Blumenthal, Nordrehaug Bhowmik De Blouw LLP the sum of \$4,216.50.
- 16 5. The Court appoints Archie Shakespeare and Tyon Hood as the representatives for the Class and
17 finds that the Incentive Awards to be paid to the Representative Plaintiffs are fair, reasonable, and
18 appropriate given their services rendered in this case and orders the payments of \$15,000 to Archie
19 Shakespeare and Tyon Hood in accordance with the Settlement.
- 20 6. The Court approves the Settlement Administration Expenses and orders the payment of \$25,000
21 to the Settlement Administrator in accordance with the Settlement.
- 22 7. The Court approves the PAGA Payment of \$160,000 to pay all applicable penalties under the
23 California Private Attorneys General Act of 2004 (the “PAGA”), 75% of which (\$120,000) will
24 be remitted to the Labor Workforce Development Agency and 25% of which (\$40,000) will be
25 distributed to the PAGA Members on a proportional basis based on the number of pay periods
26 worked by each PAGA Member during the PAGA Period.

- 1 8. The Court orders the payments to the Settlement Class Members as calculated and provided by the
2 Settlement. Any uncashed checks or other cash residue from the Settlement shall be paid to the
3 State Controller Unclaimed Property Fund in the name of the individual who failed to cash their
4 check.
- 5 9. As of the Effective Date, the Class Representatives will be deemed to have released claims as
6 provided in Section 1.06(A) of the Settlement.
- 7 10. As of the Effective Date, all Participating Class Members shall be deemed to have released the
8 Released Parties from all class claims as defined by Section 1.06(B) of the Settlement.
- 9 11. As of the Effective Date, the Release of PAGA Claims as provided in Section 1.06(C) of the
10 Settlement shall take effect.
- 11 12. Pursuant to California Rule of Court, Rule 3.769(h), and without affecting the finality of this
12 Judgment, the Court retains jurisdiction of all matters relating to the interpretation, administration,
13 implementation, effectuation, and enforcement of the Settlement and this Judgment to the full
14 extent permitted or required by law.

15 JUDGMENT SHALL BE AND HEREBY IS ENTERED.

16
17 DATED: 5/23, 2025

18 
Katherine Bacal, Superior Court Judge