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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF IMPERIAL

PRISCILLA LOPEZ,

Plaintiffs,

vs.

GEO SECURE SERVICES, LLC, a Florida
Limited Liability Company; and DOES 1-10,
inclusive,

Defendants.

AND ALL CONSOLIDATED LITIGATIONS.

Case No. ECU002060

**PLAINTIFFS' SUPPLEMENTAL
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF THE
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 25, 2024
Time: 8:30 a.m.
Dept.: 5
Judge: Hon. Jeffrey B. Jones
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I. SUPPELEMTNAL MEMORANDUM

This matter is a proposed “Wage and Hour” representative (*i.e.*, “PAGA”) and class action settlement.

The parties fully briefed a Motion for Final Approval that was heard by this Court on May 9, 2024. The parties informed the Court after the conclusion of the original notice period, GEO identified an additional thirty (30) employees that should have been part of the settlement group. However, these individuals never received notice due to a failure by GEO to previously identify them as potential class members. This appears to be an innocent mistake on the part of GEO.

At the May 9, 2024 hearing, the Court instructed the parties to send an additional class notice to these thirty individuals. This was completed. (See Supplemental Declaration of Settlement Administrator Nicole Bench at ¶ 12). The deadline to respond was June 14, 2024. (*Id.*) None of these thirty individuals objected to the settlement or requested to be excluded.

Following the distribution of the original Notice and supplemental mailing to the class, the proposed final settlement figures are as follows:

Approximate size of class:	2,316
Objections to Settlement:	Zero (0)
Opt-Outs:	One (1) (0.04%)
Settlement Fund (“GSA”):	\$3,690,000.00
Settlement administration:	\$21,000.00
Class representative incentives:	\$50,000.00 (\$10,000.00 each - Five Plaintiffs)
LWDA payment:	\$112,500.00 (75 % Share of \$150,000 allocation)
Attorney's fees:	\$1,230,000.00 (1/3 of total)
Litigation costs:	\$45,211.62

Please Note: there have been **no** (zero) objections to this proposed settlement. The estimated *average* gross payment to each participating Class Member based on the above figures is **\$947.23**, which does not account for the fact that certain class members will receive more or less than an “average” share, depending on the length of time each worked for Defendants during the class period. (Supplemental Bench Decl. at ¶ 21.) Class Members who also worked during the

1 defined "PAGA Period" will also receive an additional estimated average payment of **\$16.64**.
2 (Supplemental Bench Decl. at ¶ 22.)

3 Plaintiffs are not seeking any additional costs or fees related to the supplemental mailing.
4 All other terms of settlement remain the same as set forth in Plaintiff's original Motion for
5 Final Approval filed on April 17, 2024.
6

7 **II. REQUEST**

8 The Court now has the "final" numbers. No other changes to the Settlement were made.
9 Accordingly, the Court should grant Final Approval for all of the reasons set forth in Plaintiff's
10 original Motion filed on April 17, 2024.

11 Plaintiffs respectfully request that this Court grant Plaintiffs' Motion consistent with the
12 accompanying Amended Proposed Order and Final Judgment.

13
14 Dated: June 21, 2024

**SULLIVAN & YAECKEL LAW GROUP,
APC**

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