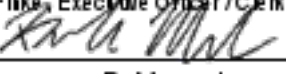


11/06/2024

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By:  Deputy  
B. Mercado

1 Raul Perez (SBN 174687)  
Raul.Perez@capstonelawyers.com  
2 Roxanna Tabatabaepour (SBN 260187)  
Roxanna.Taba@capstonelawyers.com  
3 Ryan Tish (SBN 274284)  
Ryan.Tish@capstonelawyers.com  
4 Alexander Wallin (SBN 320420)  
Alexander.Wallin@capstonelawyers.com  
5 CAPSTONE LAW APC  
1875 Century Park East, Suite 1000  
6 Los Angeles, California 90067  
Telephone: (310) 556-4811  
7 Facsimile: (310) 943-0396

8 Attorneys for Plaintiff Christina White

9 *(Additional counsel listed on next page)*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF ALAMEDA**

12 CHRISTINA WHITE, as an aggrieved  
13 employee pursuant to the Private Attorneys  
General Act ("PAGA"), on behalf of the State of  
14 California and other aggrieved employees,

15 Plaintiff,

16 vs.

17 REVOLUTION FOODS, INC., a Delaware  
18 corporation; and DOES 1 through 10, inclusive,

19 Defendants.

20  
21 FREDRIC LEE WYNN SR., individually and  
on behalf of himself and all others similarly  
22 situated,

23 Plaintiffs,

24 vs.

25 REVOLUTION FOODS, INC., a Delaware  
26 corporation; and DOES 1 through 10, inclusive,

27 Defendants.

28 James R. Hawkins (SBN 192925)

Lead Case No. RG21113829  
Assigned to the Hon. Brad Seligman

**[AMENDED PROPOSED] ORDER  
APPROVING THE PARTIES' PAGA  
SETTLEMENT AGREEMENT AND  
JUDGMENT**

Date: November 5, 2024  
Time: 3:00 p.m.  
Place: Department 22

Complaint Filed: September 24, 2021  
Trial Date: None Set

Case No. 22CV012192

1 James@Jameshawkinsaplc.com  
Christina M. Lucio (SBN 253677)  
2 Christina@Jameshawkinsaplc.com  
JAMES HAWKINS APLC  
3 9880 Research Drive, Suite 200  
Irvine, California 92618  
4 Telephone: (949) 387-7200  
Facsimile: (949) 387-6676  
5

6 Attorneys for Plaintiff Fredric Lee Wynn Sr.  
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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 \$900,000. After deducting the  
6 approved amounts for attorneys' fees and costs, Plaintiffs' Service Awards, and settlement  
7 administration costs, the net settlement amount of \$581,606.70 will be allocated as follows: Seventy-  
8 Five Percent (75%), or approximately \$436,205.03, shall be paid to the California Labor and Workforce  
9 Development Agency, and the remaining Twenty-Five Percent (25%), or approximately \$145,401.67,  
10 shall be paid to PAGA Members.

11 9. The Court hereby awards \$270,000 in attorneys' fees and \$23,393.30 costs to Plaintiffs'  
12 Counsel, Capstone Law APC and James Hawkins APLC. The award of attorneys' fees and costs will be  
13 divided as follows: (a) \$191,700 in attorneys' fees and \$12,893.75 in litigation costs to Capstone Law  
14 APC; and (b) \$78,300 in attorneys' fees and \$10,499.55 in litigation costs to James Hawkins APLC.

15 10. The Court approves Service Awards of \$5,000, each, to Christina White and Fredric Lee  
16 Wynn Sr.

17 11. The Court appoints CPT Group, Inc. to serve as the Settlement Administrator, and  
18 approves Settlement Administration Costs of \$15,000.

19 12. Plaintiffs shall file a declaration from the Settlement Administrator regarding the  
20 completion of settlement administration activities no later than July 1, 2025, as well as an amended  
21 judgment regarding the distribution of unclaimed residuals to the cy pres beneficiary, The Justice Gap  
22 Fund maintained by The State Bar of California. The Court sets a non-appearance compliance hearing  
23 for July 8, 2025 at 3:00 p.m., at which time the Court will consider evidence that the distribution process  
24 is complete and that a final accounting may be approved.

25 13. This Judgment shall be binding on all PAGA Members and the State of California, who  
26 are hereby barred by the doctrine of res judicata from re-litigating the Released Claims during the PAGA  
27 Period, as those terms are defined by the Settlement. *See Arias v. Superior Court*, 46 Cal. 4th 969, 986  
28 (2009) (holding that a judgment in a representative action brought by an aggrieved employee under

PAGA is binding not only on the named employee plaintiff but also on state labor law enforcement agencies and any aggrieved employee not a party to the proceeding).

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

15. This document shall constitute a judgment under California Code of Civil Procedure § 664.6.

**IT IS SO ORDERED, ADJUDGED, AND DECREED**

11/06/2024

Date

Hon. Brad Seligman

**Brad Seligman, Judge**  
Alameda County Superior Court Judge

**PROOF OF SERVICE**

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

On **November 5, 2024**, I served the document(s) described as: **[AMENDED PROPOSED] ORDER APPROVING THE PARTIES' PAGA SETTLEMENT AGREEMENT AND JUDGMENT** on the interested parties in this action by sending [ ] the original [✓] a true copy thereof [✓] to interested parties as follows [or] [ ] as stated on the attached service list:

Ashley Farrell Pickett  
farrellpicketta@gtlaw.com  
Mark D. Kemple  
kemplem@gtlaw.com  
Matthew Weber  
Matthew.weber@gtlaw.com  
GREENBERG TRAUIG LLP  
1840 Century Park East, 19<sup>th</sup> Floor  
Los Angeles, CA 90067  
Telephone: 310-586-7700  
Facsimile: 310-586-7800

*Attorneys for*  
REVOLUTION FOODS, INC., a  
Delaware corporation

James R. Hawkins  
james@jameshawkinsaplc.com  
Christina M. Lucio  
Christina@jameshawkinsaplc.com  
JAMES HAWKINS APLC  
9880 Research Drive, Suite 200  
Irvine, CA 92618  
Telephone: 949-387-7200  
Facsimile: 949-387-6676

*Attorneys for Plaintiff*  
Fredric Lee Wynn Sr.

[ ] **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

[X] **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

[ ] **BY FAX:** I hereby certify that this document was served from Los Angeles, California, by facsimile delivery on the parties listed herein at their most recent fax number of record in this action.

[ ] **BY PERSONAL SERVICE:** I caused delivery of the document(s), enclosed in a sealed envelope, by hand via ProLegal Network to the offices of the addressee(s) named herein.

[ ] **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice,

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overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **November 5, 2024**, at Los Angeles, California.

|                    |                          |
|--------------------|--------------------------|
| Stacy Winberg      | /s/ <i>Stacy Winberg</i> |
| Type or Print Name | Signature                |