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FILED
Superior Court of California
County of Los Angeles
03/08/2024
David W. Slayton, Executive Officer / Clerk of Court
By: A. Morales Deputy

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

CADYN CATHERS, individually and on behalf
of himself all others similarly situated,

Plaintiff,

vs.

MOUNT SAINT MARY'S UNIVERSITY, a
California Non-Profit Corporation,

Defendant.

CASE NO. 22STCV02941

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

Date: March 8, 2024

Time: 10:00 a.m.

Dept. 7

1 This matter is before the Court on Plaintiff's unopposed Motion for Order Granting Final Approval
2 of Class Action Settlement and Motion for Approval of Attorneys' Fees and Costs and Class
3 Representative's Enhancement Awards. The Motions, having been fully considered by the Court, are ruled
4 upon as follows:

5 1. The Class Action Settlement Agreement attached hereto as **Exhibit 1** is fully and finally
6 approved and is hereby incorporated by reference and all defined terms therein shall have the same
7 meaning in this Order as set forth in the Settlement Agreement.

8 2. Pursuant to California Rules of Court, Rule 3.769(d), this Court makes final the conditional
9 class certification contained in the Order Granting Preliminary Approval of Class Action Settlement, and
10 thus certifies the class for the purposes of this settlement defined as: all persons who are or have been
11 employed by Defendant in California as adjunct instructors from January 25, 2018 to May 9, 2023.

12 3. Plaintiff is appointed and designated, for all purposes, as Class Representative, and
13 HammondLaw, P.C., is appointed and designated as counsel for the Class. The Court finds that attorneys
14 for the Class are experienced class action litigators and have expressed the view that the Settlement is fair,
15 reasonable, and adequate, which further supports approval of the Settlement.

16 4. The Court hereby finds that Class Notice has been sent to Class Members as previously
17 ordered by the Court, and that such Notice fairly and adequately described the terms of the proposed
18 Settlement Agreement, the manner in which Class Members could object to or opt-out of the settlement;
19 was the best notice practicable under the circumstances; and complied fully with California Rule of Court
20 3.769, and all other applicable laws.

21 5. In response to the Notice, two Class Members opted out: Karen Fritschi and Paul Thomas
22 Brogan. In response to the Notice, no Class Member objected.

23 6. The Court finds that a full and fair opportunity has been afforded to Class Members to
24 participate in the proceedings convened to determine whether the proposed Settlement Agreement should
25 be given final approval. Accordingly, the Court hereby determines that all Class Members who did not
26 file a timely and proper request to be excluded from the settlement shall be deemed to have released the
27 Released Parties from all Released Claims.

28 7. The Court hereby finally and unconditionally approves the Settlement Agreement, enters
judgment, and specifically:

a. Approves the Gross Settlement of \$1,110,000;

b. Approves the application for Class Representative's service award in the amount of \$7,500.

1 c. Approves Class Counsels' request for an award of \$370,000, representing 1/3 of the Gross
2 Settlement Amount, as reasonable attorneys' fees;

3 d. Approves Class Counsel's hourly rates as reasonable, and within the range of market rates
4 that attorneys with similar levels of skill, experience and reputation for handling matters of similar
5 complexity; and finds that the fees' request is justified under the lodestar/multiplier analysis.

6 e. Approves Class Counsel's request for reimbursement of litigation costs of \$20,322.53;

7 f. Approves payment to the Settlement Administrator of \$9,000; and

8 g. Approves the allocation of \$30,000 as payment for penalties under the California Labor
9 Code Private Attorney Generals Act ("PAGA"); and

10 h. Approves the payment from the Net Settlement of amounts determined by the Settlement
11 Administrator to be due to the Class Members.

12 8. Pursuant to CRC Rule 3.771(b), the Settlement Administrator shall give Notice of Entry
13 of Judgment by promptly posting this Judgment and Order on the Settlement Administrator's website.

14 9. The settlement checks shall be void 180 days after the date of mailing. Following the
15 check cashing deadline, the parties shall submit a report to the Court including the total amount paid to
16 the Class, the amount of the checks that were not cashed, and the date those funds were transmitted to
17 the State Controller's Office of Unclaimed Property.

18 10. Pursuant to California Rule of Court 3.769(h), the Court retains exclusive and continuing
19 jurisdiction over the litigation to enforcing the terms of the judgment, and supervising, implementing,
20 interpreting, and enforcing this Final Approval Order and the Settlement Agreement.

21 **IT IS SO ORDERED AND ADJUDGED.**



A handwritten signature in black ink, appearing to read "Lawrence P. Riff".

Lawrence P. Riff / Judge

22 Date: 03/08/2024, 2024

Hon. Lawrence Riff
Judge of the Superior Court

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25 11. The court sets a non-appearance case review for March 10, 2025 at 9:00 a.m. regarding the
26 disbursement of the settlement proceeds. The administrator or class counsel shall file a
27 declaration re same five court days before the hearing.