

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

RECEIVED

FILED
San Diego Superior Court

JUL 11 2025
Clerk of the Superior Court
By: V. Secaur, Deputy

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

STEPHEN V. WEAVER, ZUBEIR
KHAN, CHAD M. ESQUIVEL,
SAMPSON DANQUAH, and MARCO
LAFON, individually and on behalf of all
others similarly situated,
Plaintiffs,

v.

AMENTUM SERVICES, INC.; and DOES
1 through 20, inclusive,

Defendants.

Case No. 37-2021-00049868-CU-OE-CTL

*Assigned for all purposes to
Hon. Judge Marcella O. McLaughlin
Department C-72*

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

Date: July 11, 2025
Time: 9:30 a.m.
Dept: C-72

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

1 Carolyn Cottrell (SBN 166977)
2 Esther L. Bylsma (SBN 264208)
3 Stuart H. Kluft (SBN 315081)
4 **SCHNEIDER WALLACE COTTRELL KONECKY LLP**
5 300 S. Grand Ave, Suite 2700
6 Los Angeles, California 90071
7 Telephone: 415-421-7100; Fax: 415-421-7105
8 Email: ccottrell@schneiderwallace.com
9 Email: ebylsma@schneiderwallace.com
10 Email: skluft@schneiderwallace.com

11 Arby Aiwarzian (SBN 269827)
12 Joanna Ghosh (SBN 272479)
13 Ryan Slinger (SBN 351297)
14 **LAWYERS FOR JUSTICE, PC**
15 410 West Arden Ave., Suite 203
16 Glendale, California 91203
17 Tel: (818) 265-1020; Fax: (818) 265-1021
18 joanna@calljustice.com
19 r.slinger@calljustice.com

20 Marcus Bradley, Esq. (SBN 174156)
21 Kiley Grombacher, Esq. (SBN 245960)
22 **BRADLEY/GROMBACHER, LLP**
23 31365 Oak Crest Drive, Suite 240
24 Westlake Village, CA 91361
25 Telephone: (805) 270-7100
26 Facsimile: (805) 270-7589
27 Email: mbradley@bradleygrombacher.com
28 Email : kgrombacher@bradleygrombacher.com

19 Garen Majarian, Esq. (SBN 334104)
20 Sahag Majarian, II, Esq. (SBN 146621)
21 **MAJARIAN LAW GROUP APC**
22 18250 Ventura Boulevard
23 Tarzana, California 91356
24 Telephone: (818) 263-7343
25 Facsimile: (818) 609-0892
26 E-Mail: garen@majarianlawgroup.com
27 E-Mail: Sahagii@aol.com

28 Attorneys for Plaintiffs, individually, and on behalf of all others similarly situated.

1 This matter came on for hearing on July 11, 2025, at 9:30 a.m., in Department C-72 of
2 the above-captioned Court on the Motion for Final Approval of Class Action Settlement pursuant
3 to California Rule of Court 3.769, this Court's Order Granting Preliminary Approval, and the
4 Class and Representative Action Settlement Agreement and Release ("Settlement Agreement"),
5 a copy of which was filed in conjunction with the Plaintiff's Motion for Final Approval of Class
6 Action Settlement.

7 Having received and considered the Settlement Agreement, the supporting papers filed by
8 the Parties, and the evidence and argument received by the Court in conjunction with the
9 unopposed Motion for Preliminary Approval of Class Action Settlement and the instant Motion
10 for Final Approval, the Court grants final approval of the Settlement and HEREBY ORDERS
11 AND MAKES THE FOLLOWING DETERMINATIONS:

12 1. Pursuant to the Order Granting Preliminary Approval, a Class Notice was sent to
13 each Class Member by first-class mail. These papers informed the Class of the terms of the
14 Settlement, their right to receive an Individual Settlement Payment, their right (a) to comment on
15 or object to the Settlement, (b) to request exclusion from the Settlement and pursue their own
16 remedies, and (c) of their right to appear in person or by counsel at the final approval hearing and
17 to be heard regarding approval of the Settlement. Adequate periods of time were provided by
18 each of these procedures. No member of the Class filed written objection to the proposed
19 Settlement as part of this notice process or stated an intention to appear at the final approval
20 hearing.

21 2. The Court finds and determines that this notice procedure afforded adequate
22 protections to Class Members and provides the basis for the Court to make an informed decision
23 regarding approval of the Settlement based on the responses of the Class. The Court finds and
24 determines that the notice provided in this case was the best notice practicable, which satisfied
25 the requirements of law and due process.

26 3. With respect to the Class and for purposes of approving this Settlement only, this
27 Court finds and concludes that: (a) the members of the Class are ascertainable and so numerous
28 that joinder of all members is impracticable; (b) there are questions of law or fact common to the

1 Class, and there is a well-defined community of interest among members of the Class with respect
2 to the subject matter of the Action; (c) the claims of Class Representatives are typical of the claims
3 of the members of the Class; (d) the Class Representatives have fairly and adequately protected
4 the interests of the members of the Class; (e) a class action is superior to other available methods
5 for an efficient adjudication of this controversy; and (f) the counsel of record for the Class
6 Representatives, i.e., Class Counsel, are qualified to serve as counsel for Plaintiff in their
7 individual and representative capacities for the Class.

8 4. The Court has certified a Class, as that term is defined in and by the terms of the
9 Settlement Agreement as (a) all current and former non-exempt employees employed by
10 Defendant, and Defendant's subsidiary and affiliate, URS Federal Services, LLC in California
11 between May 30, 2017, through March 17, 2024; (b) all current and former non-exempt
12 employees employed by Defendant's subsidiary and affiliate DynCorp International LLC in
13 California between November 20, 2020, through March 17, 2024; and (c) all current and former
14 non-exempt employees employed by Defendant's subsidiary and affiliate PAE Shared Services,
15 LLC in California between September 20, 2022, through March 17, 2024. (individually, "Class
16 Member"; collectively, the "Class"), and the Court deems this definition sufficient for purposes
17 of California Rule of Court 3.765(a).

18 5. The Court hereby confirms Aegis Law Firm, PC; Schneider Wallace Cottrell
19 Konecky LLP; Lawyers for Justice; and Bradley/Grombacher, LLP as Class Counsel.

20 6. The Court hereby confirms Plaintiffs Stephen V. Weaver, Zubeir Khan, Chad M.
21 Esquivel, Sampson Danquah, and Marco Lafon as the Class Representatives in this Action.

22 7. The Court finds and determines that the terms set forth in the Settlement
23 Agreement are fair, reasonable, and adequate and directs the Parties to effectuate the Settlement
24 according to its terms, having found that the Settlement was reached as a result of informed and
25 non-collusive arm's-length negotiations facilitated by a neutral mediator. The Court further finds
26 that the Parties conducted extensive investigation and that their attorneys were able to reasonably
27 evaluate their respective positions. The Court also finds that the Settlement will enable the Parties
28 to avoid additional and potentially substantial litigation costs, as well as delay and risks if the

1 Parties were to continue to litigate the case. The Court has reviewed the monetary recovery
2 provided as part of the Settlement and recognizes the significant value accorded to the Class.

3 8. The Court further finds and determines that the terms of the Settlement are fair,
4 reasonable and adequate to the Class and to each Participating Class Member and that the
5 Settlement is ordered finally approved, and that all terms and provisions of the Settlement should
6 be and hereby are ordered to be consummated.

7 9. The Court hereby approves the Gross Settlement Amount of \$7,500,000.00.

8 10. The Court finds and determines that the Individual Settlement Payments to be paid
9 to Participating Class Members as provided for by the Settlement are fair and reasonable. The
10 Court hereby gives final approval to and orders the payment of those amounts be made to the
11 Participating Class Members in accordance with the Settlement Agreement.

12 11. The Court finds and determines that payment to the California Labor and
13 Workforce Development Agency of \$150,000.00 as its share of the settlement of civil penalties
14 in this case is fair, reasonable, and appropriate. The Court hereby gives final approval to and
15 orders that the payment of that amount be paid in accordance with the Settlement Agreement.

16 12. The Court finds and determines that the fees and expenses in administering the
17 Settlement incurred by Phoenix Settlement Administrators in the amount of \$29,500.00, are fair
18 and reasonable. The Court hereby gives final approval to and orders that the payment of that
19 amount in accordance with the Settlement.

20 13. The Court finds and determines the Class Representatives Service Payment of
21 \$15,000.00 each to Plaintiffs Stephen V. Weaver, Zubeir Khan, Sampson Danquah, and Chad
22 M. Esquivel, and up to \$10,000.00 to Plaintiff Marco Lafon are fair and reasonable. The Court
23 hereby orders the Administrator to make this payment to the Plaintiffs/Class Representatives in
24 accordance with the terms of the Settlement Agreement.

25 14. Pursuant to the terms of the Settlement, and the authorities, evidence and argument
26 submitted by Class Counsel, the Court hereby awards Class Counsel attorneys' fees in the sum of
27 \$2,500,000.00 and litigation costs of \$43,020.98. The Court finds such amounts to be fair and
28

1 reasonable. The Court hereby orders the Settlement Administrator to make these payments in
2 accordance with the terms of the Settlement Agreement.

3 15. Nothing in this order shall preclude any action to enforce the Parties' obligations
4 under the Settlement or under this order, including the requirement that Defendants make payment
5 to the Participating Class Members in accordance with the Settlement.

6 16. This Judgment is intended to be a final disposition in its entirety of the above
7 captioned action. Without affecting the finality of this judgment in any way, the Court retains
8 jurisdiction of all matters relating to the interpretation, administration, implementation,
9 effectuation, and enforcement of the Settlement pursuant to C.C.P. § 664.6 and the California
10 Rules of Court.

11 17. The Parties will bear their own costs and attorneys' fees except as otherwise
12 provided by this Court's Order awarding Class Counsels' Award for attorneys' fees and litigation
13 costs.

14 18. The Court sets a Hearing Re: Distribution of Settlement Funds for March 20, 2026,
15 at 9:30 a.m. Class Counsel are ordered to file a Final Report Re: Distribution of the Settlement
16 Funds by the Administrator five court days prior.

17
18 DATED: 7/11/2025

[Signature]
Honorable Marcella O. McLaughlin
JUDGE OF THE SUPERIOR COURT