

Edwin Aiwarzian (SBN 232943)
Joanna Ghosh (SBN 272479)
Matthew Richard Soto (SBN 353499)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

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

LATISHA ANQUETTE JOHNSON,
individually, and on behalf of other members
of the general public similarly situated and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff

vs.

AMERICARE HEALTH & RETIREMENT
INC., a California corporation; SILVERGATE
FALLBROOK, an unknown business entity;
AMERICARE HEALTHCARE &
RETIREMENT, INC., an unknown business
entity; SILVERGATE SAN MARCOS, an
unknown business entity; SILVERGATE
RETIREMENT RESIDENCE & MEMORY
CARE SUITES, an unknown business entity;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2022-00051286-CU-OE-CTL

Honorable Joel R. Wohlfeil
Department C-73

CLASS ACTION

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

Date: July 12, 2024
Time: 9:00 a.m.
Department: C-73

Complaint Filed: December 22, 2022
Trial Date: None Set

1 This matter has come before the Honorable Joel R. Wohlfeil in Department C-73 of the above-
2 entitled Court, located at 330 West Broadway, San Diego, California 92101, on Plaintiff Latisha
3 Anqunette Johnson's ("Plaintiff") Motion for Final Approval of Class Action Settlement ("Motion
4 for Final Approval") and Motion for Attorneys' Fees and Costs, and Service Award ("Motion for
5 Fees"). Lawyers *for* Justice, PC appeared on behalf of Plaintiff, and Quarles & Brady LLP appeared
6 on behalf of Defendant Americare Health & Retirement Inc. ("Defendant").

7 On November 3, 2023, the Court entered the Order Granting Preliminary Approval of Class
8 Action Settlement ("Preliminary Approval Order"), thereby preliminarily approving the settlement of
9 the above-entitled action ("Action") in accordance with the Class Action and Private Attorney
10 General Act Settlement Agreement ("Settlement," "Agreement," or "Settlement Agreement"), which,
11 together with the exhibits annexed thereto, set forth the terms and conditions for settlement of the
12 Action.

13 Having reviewed the Settlement Agreement and duly considered the parties' papers and oral
14 argument, and good cause appearing,

15 **THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS:**

16 1. All terms used herein shall have the same meaning as defined in the Settlement
17 Agreement and the Preliminary Approval Order.

18 2. This Court has jurisdiction over the claims of the Class Members asserted in this
19 proceeding and over all parties to the Action.

20 3. The Court finds that a Service Award in the amount of \$7,500.00 is fair and reasonable
21 for the work performed by Plaintiff on behalf of the Class and the State of California. It is hereby
22 ordered that the Settlement Administrator issue payment in the amount of \$7,500.00 to Plaintiff
23 Latisha Anqunette Johnson for her Service Award, according to the terms and methodology set forth
24 in the Settlement Agreement.

25 4. The Court finds that the request for attorneys' fees in the amount of \$514,500.00 to
26 Class Counsel falls within the range of reasonableness, and the results achieved justify the award
27 sought. The requested attorneys' fees to Class Counsel are fair, reasonable, and appropriate, and are
28 hereby approved. It is hereby ordered that the Settlement Administrator issue payment in the amount

1 of \$514,500.00 to Class Counsel for attorneys' fees, in accordance with the terms and methodology
2 set forth in the Settlement Agreement.

3 5. The Court finds that reimbursement of litigation costs and expenses in the amount of
4 \$15,639.09 to Class Counsel is reasonable, and hereby approved. It is hereby ordered that the
5 Settlement Administrator issue payment in the amount of \$15,639.09 to Class Counsel for
6 reimbursement of litigation costs and expenses, in accordance with the terms and methodology set
7 forth in the Settlement Agreement, as follows: \$15,639.09 to Lawyers *for* Justice PC.

8 6. After entry of this Order, pursuant to California Rules of Court, Rule 3.769(h), the
9 Court shall retain jurisdiction to construe, interpret, implement, and enforce the Settlement
10 Agreement and this Order, to hear and resolve any contested challenge to a claim for settlement
11 benefits, and to supervise and adjudicate any dispute arising from or in connection with the
12 distribution of settlement benefits.

13 7. Notice of entry of this Order shall be given to the Settlement Class Members by posting
14 a copy of the Order on the Settlement Administrator's website for a period of at least sixty (60)
15 calendar days after the date of entry of this Order. Individualized notice is not required.

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17 Dated: _____

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19 Honorable Joel R. Wohlfeil
20 Judge of the Superior Court
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