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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF SHASTA**

11 ERIK FOSS, individually and on behalf of all)
12 persons similarly situated,)

13 Plaintiff,)

14 v.)

15 ANDERSON HOSPITALITY, INC., a)
16 California corporation and DOES 1 through)
17 50, Inclusive,)

18 Defendants.)
19

Case No. 195317

[PROPOSED] JUDGMENT

Date: July 18, 2022
Time: 8:30 a.m.

Judge: Stephen H. Baker
Dept.: 3

20 Having read and carefully considering all matters related to the Settlement of Class Action
21 and PAGA Claims, and Release of Claims and having issued an Order Granting Final Approval of
22 the Class Action Settlement (“Settlement Agreement”), Judgment is to be entered as follows:

23 In accordance with, and for the reasons stated in the Court’s Order Granting Plaintiff’s
24 Motion for Final Approval of Class Action Settlement, Judgment shall be entered whereby
25 Plaintiff ERIK FOSS (“Plaintiff”) and all Class Members shall take nothing from defendant
26 ANDERSON HOSPITALITY, INC. (“Defendant”), except as expressly set forth in the Settlement
27 Agreement. The Court hereby certifies the class as follows:

28 (a) The “Non-Exempt Class” is “All non-exempt employees who are

1 or previously were employed by Defendant in California during
2 the Class Period.”

3 The Class Period is defined as the period between July 2, 2016 to October 31, 2021.

4 In exchange for and consideration of the \$100,000 Total Settlement Fund, Judgment is
5 entered by which the Settlement Class Members are conclusively determined to have provided a
6 release of, and are permanently enjoined and forever barred from asserting, the Released Claims
7 against the Released Parties, pursuant to the Settlement Agreement.

8 This Court shall retain jurisdiction with respect to all matters related to the administration
9 and consummation of the Settlement, and any and all claims, asserted in, arising out of, or related
10 to the subject matter of the lawsuit, including but not limited to all matters related to the
11 Settlement, this Judgment, and the determination of all controversies relating thereto.

12 Plaintiff shall give notice of this Judgment to Class Members, pursuant to rule 3.771 of the
13 California Rules of Court, by posting an electronic copy of the Judgment on the Settlement
14 Administrator’s website.

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16 IT IS SO ADJUDICATED.

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18 The Court directs that this Judgment shall be entered.

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20 IT IS SO ORDERED.

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22 Date: _____, 2022

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The Honorable Judge of the Superior Court

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