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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

JIE XU, individually and on behalf of all
persons similarly situated

Plaintiffs,

vs.

HT MULTINATIONAL, INC., a California
Corporation; CHTC (USA), INC., a California
Corporation; HT INDUSTRIES, INC., a
Corporation, and Does 1 through 50, Inclusive,

Defendants.

Case No. CIVDS2015679

[PROPOSED] JUDGMENT

Hearing Date: December 12, 2022

Hearing Time: 10:00 a.m.

Judge: Hon. David Cohn

Dept: S-26

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

5 In accordance with, and for the reasons stated in the Court’s Order Granting Plaintiff’s Motion
6 for Final Approval of Class and PAGA Action Settlement, Judgment shall be entered whereby
7 Plaintiff JIE XU (“Plaintiff”) and all Class Members shall take nothing from Defendants HT
8 MULTINATIONAL, INC. dba HT INDUSTRIES, INC. and CHTC (USA), INC. (hereinafter
9 “Defendants”), except as expressly set forth in the Settlement Agreement. The Court hereby certifies
10 the class as follows:

- 11 (a) The “Class” is “All of Defendants’ current and former employees,
12 classified at some point within the Class Period as exempt but not paid
13 two times the minimum wage, employed in California during the Class
14 Period.”; and
15 (b) The “Class Period” means the period from April 6, 2016 through April
16 23, 2022.

17 In exchange for and consideration of the \$150,000.00 Gross Settlement Fund, Judgment is
18 entered by which the Settlement Class Members are conclusively determined to have provided a
19 release of, and are permanently enjoined and forever barred from asserting, the Released Class Claims
20 against the Released Parties, pursuant to the Settlement Agreement.

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

1 Plaintiff shall give notice of this Judgment to Class Members, pursuant to rule 3.771 of the
2 California Rules of Court, by posting an electronic copy of the Judgment on the Settlement
3 Administrator's website.

4
5 IT IS SO ADJUDICATED.

6
7 The Court directs that this Judgment shall be entered.

8
9 IT IS SO ORDERED.

10
11 Date: _____, 2022

JUDGE OF THE SUPERIOR COURT