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

FELISSIA FRY, 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.

MERAKEY ALLOS, a Pennsylvania
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 37-2022-00032123-CU-OE-CTL

Honorable Loren G. Freestone
Department C-64

CLASS ACTION

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

Date: January 9, 2026
Time: 10:30 AM
Department: C-64

Complaint Filed: August 11, 2022
FAC Filed: October 20, 2022
SAC Filed: September 24, 2024
Trial Date: None Set

1 This matter has come before the Honorable Loren G. Freestone, in Department C-64 of
2 the above-entitled Court, located at 330 W Broadway, San Diego, California 92101, on January
3 9, 2026 at 10:30 AM, on Plaintiff Felissia Fry’s (“Plaintiff”) Motion for Final Approval of Class
4 Action and PAGA Settlement (“Motion for Final Approval”) and Motion for Attorneys’ Fees
5 and Costs, and Incentive Award (“Motion for Fees”). Lawyers *for* Justice, PC, appeared on
6 behalf of Plaintiff and the Class, and Faegre Drinker Biddle & Reath LLP appeared on behalf of
7 Defendant Merakey Allos (“Defendant”).

8 On August 20, 2025, the Court entered the Order Granting Preliminary Approval of Class
9 Action and PAGA Settlement (“Preliminary Approval Order”), thereby preliminarily approving
10 the settlement of the above-entitled action in accordance with the Joint Stipulation of Class
11 Action and PAGA Settlement and Release (“Settlement,” “Agreement,” or “Settlement
12 Agreement”), which, together with the exhibits annexed thereto set forth the terms and
13 conditions for settlement of the Action.

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

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

- 17 1. The Motion for Fees is granted in its entirety.
- 18 2. This Order incorporates by reference the definitions in the Settlement Agreement
19 and Preliminary Approval Order, and all capitalized terms used, but not defined, herein shall
20 have the same meanings as in the Settlement Agreement and Preliminary Approval Order.
- 21 3. The Court finds that the Incentive Award in the amount of \$7,500.00 to Plaintiff
22 Felissia Fry is fair and reasonable, and hereby approved. It is hereby ordered that the
23 Settlement Administrator issue payment in the amount of \$7,500.00 to Plaintiff Felissia Fry for
24 her Incentive Award, according to the terms set forth in the Settlement Agreement.
- 25 4. The Court finds that attorneys’ fees in the amount of \$682,062.50 to Class
26 Counsel falls within the range of reasonableness and that the results achieved justify the award
27 sought, and is hereby approved. It is hereby ordered that the Settlement Administrator issue
28

1 payment in the amount of \$682,062.50 to Class Counsel for attorneys' fees, in accordance with
2 the terms and methodology set forth in the Settlement Agreement.

3 5. The Court finds that reimbursement of litigation costs and expenses in the
4 amount of \$14,356.27 to Class Counsel is reasonable, and hereby approved. It is hereby
5 ordered that the Settlement Administrator issue payment in the amount of \$14,356.27 to Class
6 Counsel for reimbursement of litigation costs and expenses, in accordance with the terms and
7 methodology set forth in the Settlement Agreement.

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

13 7. Individualized notice of this Order is not required. The Settlement Administrator
14 shall post a copy of the Order on the Settlement Administrator's website for a period of at least
15 sixty (60) calendar days after the date of entry of this Order.

16 **IT IS SO ORDERED.**

17
18 DATE: _____

The Honorable Loren G. Freestone
Judge of the San Diego County Superior Court
of California