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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

ALFRED APPIAH, as a private attorney general,

Plaintiff,

vs.

GRAIL, INC., a Delaware corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No. 25CV012765

[Hon. Lauri A. Damrell, Department 22]

**[PROPOSED] ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND FINAL JUDGMENT**

Date: August 21, 2026
Time: 9:00 a.m.
Department: 22

Complaint Filed: May 29, 2025

1 The motion for an Order Granting Approval of PAGA Settlement was filed by Plaintiff, Alfred
2 Appiah, on July 28, 2026, and a hearing was held before this Court on August 21, 2026.

3 After considering the papers and evidence, arguments of counsel, and all other matters presented
4 to the Court, and having taken the matter under submission, **IT IS HEREBY ORDERED AND**
5 **ADJUDGED** as follows:

6 1. The motion for approval of the Labor Code Private Attorneys General Act of 2004
7 (“PAGA”) settlement is granted. Plaintiff has fairly and adequately protected the interests of the State,
8 and Plaintiff’s Counsel are qualified to serve as counsel for the Plaintiff in his individual and
9 representative capacity. The Joint Stipulation of PAGA Settlement (the “Agreement”) submitted by the
10 Parties appears to be fair, adequate, and reasonable in light of PAGA’s policies and in furtherance of
11 PAGA’s purposes.

12 2. The Parties are hereby ordered to carry out the terms of the Agreement.

13 3. Within 30 days of the Effective Date defined in the Agreement, Defendant, Grail, Inc., is
14 hereby ordered to deposit the \$70,225.00 Settlement Amount with Phoenix Settlement Administrators
15 (the “Administrator”).

16 4. Within 15 days after receipt of the Settlement Amount, the Administrator shall distribute
17 the Settlement Amount as follows:

- 18 • \$23,408.33 as Attorneys’ Fees to Plaintiff’s Counsel;
- 19 • \$15,378.02 as Costs to Plaintiff’s Counsel;
- 20 • \$4,000.00 as Administration Costs to the Administrator;
- 21 • \$17,835.12 as PAGA Penalties to the Labor and Workforce Development Agency; and
- 22 • \$9,603.53 as PAGA Penalties to PAGA Settlement Members based on the number of
23 relevant pay periods worked by each PAGA Settlement Member.

24 5. The Court grants approval of the settlement in accordance with the terms of the
25 Agreement and this Order.

26 6. A compliance hearing is set for **July 9, 2027**, at 10:30 a.m. in Department 22 of this
27 Court. At least 15 days prior to the compliance hearing, Plaintiff shall file a declaration from the
28 Administrator establishing the status of distribution of settlement funds.

1 7. The Court hereby enters Final Judgment. Without affecting the finality of the Order and
2 Final Judgment filed herewith, the Court reserves continuing jurisdiction over the Action, Plaintiff, and
3 Defendant for the purposes of (i) the interpretation and enforcement of the terms of the settlement, (ii)
4 settlement administration matters, and (iii) post-Judgment matters as may be appropriate under Court
5 rules or as set forth in the Agreement.

6 8. Except as otherwise provided in the Agreement, the Parties are to bear their own costs
7 and attorneys' fees.

8 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

9 DATED: _____, 2026

HON. LAURI A. DAMRELL