

FILED
San Francisco County Superior Court

MAY 26 2026

CLERK OF THE SUPERIOR COURT
By *Alisa Allen*
Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

DEPARTMENT 304

SANDRA SUMMERS and
DARIIA FELDENHEIMER,
individually and on behalf of all other
similarly situated aggrieved employees,

Plaintiffs,

v.

CROSS COUNTRY HEALTHCARE, INC.,
TRAVEL STAFF, LLC and DOES 1-50,
inclusive

Defendants.

Case No. CGC-23-611080

AMENDED JUDGMENT

1 **AMENDED JUDGMENT**

2 Amended Judgment is hereby entered in accordance with the terms of this Court's Final
3 Approval Order.

4 The Settlement Class is defined as follows:

5 The 209 travel nurses identified by the Parties who worked for Travel Staff LLC (an
6 affiliate of Cross County Healthcare, Inc.) in California and who experienced a rate
7 reduction during the term of their temporary working assignment in California between
8 September 13, 2019 and August 13, 2024.

9 No Settlement Class Members objected to or requested exclusion from the Settlement
10 following a full and fair opportunity to participate. Accordingly, this Judgment binds all
11 Settlement Class Members.

12 By operation of this Amended Judgment, Settlement Class Members shall release, through
13 the date of the written Settlement Agreement, Released Parties from any and all Released Claims,
14 pursuant to the terms of the Settlement Agreement.

15 The Gross Settlement Amount is \$2,345,000, in addition to Defendants' share of payroll
16 taxes. In its Final Approval Order, the Court authorized the following distributions from the
17 Gross Settlement Amount: (1) \$781,588.50 in attorneys' fees to Class Counsel; (2) \$48,619.24 in
18 Litigation Costs to Class Counsel; (3) a Class Representative Service Award of \$10,000 each to
19 Plaintiffs Sandra Summers and Dariia Feldenheimer for a total of \$20,000; (4) \$8,827 in
20 settlement administration costs to Analytics Consulting LLC; and (5) \$7,500 to the Labor and
21 Workforce Development Agency ("LWDA") for civil penalties pursuant to the Private Attorneys
22 General Act ("PAGA").

23 The Settlement Administrator is directed to calculate Settlement Class Members'
24 Individual Settlement Payments from the Net Settlement Fund and issue payments in accordance
25 with the terms of the Settlement Agreement.

26 Settlement checks that remain uncashed more than 180 calendar days after issuance shall
27 be cancelled. In the event that the total amount of funds that remain unclaimed is equal to or
28 exceeds \$200,000, the Settlement Administrator shall conduct a second distribution to
Participating Class Members in proportion to their first Settlement Shares. Any funds that remain

1 unclaimed more than 180 calendar days following the second distribution shall be tendered to the
2 *cy pres* beneficiary, Legal Aid at Work, in accordance with the Settlement Agreement. In the
3 event that the initial distribution results in less than \$200,000 in unclaimed funds, the Settlement
4 Administrator shall tender the residual funds to the *cy pres* beneficiary. The Court finds the *cy*
5 *pres* beneficiary is appropriate pursuant to Code of Civil Procedure section 384(b).

6 As of May 22, 2026, the total amount of residual funds from the distribution is
7 \$74,811.16. (Supp. Decl. of Settlement Administrator Regarding Distribution filed May 22,
8 2026, ¶¶ 18–19.) The Court hereby directs the Settlement Administrator to issue the unclaimed
9 funds to the *cy pres* beneficiary, Legal Aid At Work.

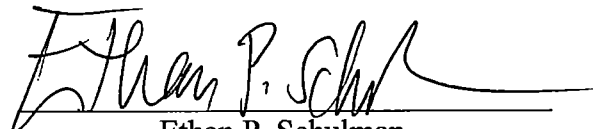
10 This Court retains jurisdiction over the Plaintiffs, each Participating Settlement Class
11 Member who has not properly excluded themselves, and Defendants, to enforce the terms of the
12 Settlement Agreement, the Final Approval Order, and this Amended Judgement.

13 This document shall constitute a judgment for the purposes of California Rules of Court,
14 rule 3.769(h).

15 Plaintiffs shall submit a copy of this Amended Judgment to the LWDA within 10 days after
16 entry of this Judgment pursuant to Labor Code § 2699(s)(3).

17
18 IT IS SO ORDERED.

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21 Dated: May 26, 2026

22 
23 Ethan P. Schulman
24 Judge of the Superior Court
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CERTIFICATE OF ELECTRONIC SERVICE
(CCP 1010.6 & CRC 2.251)

I, Felicia Green, a Deputy Clerk of the Superior Court of the County of San Francisco, certify that I am not a party to the within action.

On May 26, 2026, I electronically served AMENDED JUDGMENT via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Dated: **MAY 26 2026**

Brandon E. Riley, Court Executive Officer

By: 
Felicia Green, Deputy Clerk