



FILED
San Francisco County Superior Court

MAR 14 2025

CLERK OF THE COURT

BY: Edmund J. [Signature]
Deputy Clerk

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN FRANCISCO

DEPARTMENT 304

SANDRA SUMMERS and
DARIA 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

ORDER GRANTING (1) FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT
AND (2) ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE AWARDS

Plaintiffs' Motions for (1) Final Approval of Class Action and PAGA Settlement and (2) Attorneys' Fees, Costs, and Class Representative Service Awards came on regularly for hearing on March 7, 2025. Having considered the Settlement Agreement,¹ the arguments of counsel, and the record in this litigation, the Court hereby FINDS AND ORDERS as follows:

1. This Order of Final Approval ("Order") incorporates the Settlement Agreement by reference. All capitalized terms in this Order shall have the same meaning as set forth in the Settlement Agreement.

¹ "Settlement Agreement" refers to the Second Amended Class Action and PAGA Representative Action Settlement Agreement attached as Exhibit 1 to the Second Supplemental Declaration of Alexander Ricke filed on October 16, 2024.

1 2. This Court has personal jurisdiction over all members of the Settlement Class and
2 subject matter jurisdiction to approve the Settlement Agreement.

3 3. The Court hereby finds the terms of the Settlement are fair, reasonable, and
4 adequate to the Settlement Class and to each Settlement Class Member. As such, the Court
5 hereby grants final approval of the Settlement as, in all respects, fair, adequate and reasonable,
6 and directs the parties to effectuate the Settlement Agreement according to its terms.

7 4. For settlement purposes only, the Court hereby finds the following Settlement
8 Class satisfies all applicable requirements of Code of Civil Procedure section 382, and finally
9 certifies the following Settlement Class:

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

13 5. The Court hereby confirms the law firms of Stueve Siegel Hanson LLP and
14 Altshuler Berzon LLP as Class Counsel. The Court finds that Class Counsel has adequately
15 represented the Settlement Class for purposes of entering into and implementing the Settlement
16 Agreement.

17 6. For settlement purposes only, the Court hereby appoints Sandra Summers and
18 Dariia Feldenheimer as Settlement Class Representatives. The Court finds Plaintiffs Sandra
19 Summers and Dariia Feldenheimer to be fair and adequate representatives of the interests of the
20 Settlement Class.

21 7. The Court hereby confirms Analytics Consulting LLC as the Settlement
22 Administrator.

23 8. The Court finds that the notice program implemented pursuant to the Preliminary
24 Approval Order of October 31, 2024, including the substance of the Notice of Proposed Class
25 Action Settlement, constituted the best notice practicable under the circumstances, constituted
26 valid, due, and sufficient notice to all Settlement Class Members, and satisfies all applicable
27 requirements of due process, the Code of Civil Procedure, and all applicable authorities.
28

1 9. In response to the Notice, no member of the Settlement Class objected to the
2 Settlement or requested to be excluded from the Settlement.

3 10. The Court hereby approves the Gross Settlement Amount of \$2,345,000.
4 Defendants shall fund the Gross Settlement Amount no later than thirty (30) calendar days after
5 entry of this Order. The Court hereby orders the Settlement Administrator to disburse the
6 payments set forth herein, in accordance with the terms of the Settlement Agreement.

7 11. The Court hereby finds the Individual Settlement Payments to the Settlement Class
8 Members are fair and reasonable. The Court hereby orders payment to the Settlement Class
9 Members in accordance with the Settlement Agreement.

10 12. The Court finds that payment to the California Labor and Workforce Development
11 Agency ("LWDA") of \$7,500 as its share of the settlement of civil penalties is fair, reasonable,
12 and appropriate. The Court hereby awards the LWDA \$7,500 for its share of the settlement of
13 civil penalties.

14 13. The Court hereby finds that Class Counsel's request for Attorneys' Fees in the
15 amount of \$781,588.50 and Litigation Costs in the amount of \$48,619.24 is fair, reasonable, and
16 justified by the circumstances of the case. The Court hereby awards Class Counsel Attorneys'
17 Fees in the amount of \$781,588.50 and Litigation Costs in the amount of \$48,619.24.

18 14. The Court hereby finds the Class Representative Service Award in the amount of
19 \$10,000 for each Class Representative, for a total of \$20,000, is fair, reasonable, and appropriate.
20 The Court hereby awards a Class Representative Service Award in the amount of \$10,000 to each
21 Class Representative.

22 15. The Court hereby finds the request for Settlement Administration Costs in the
23 amount of \$8,827 is fair, reasonable, and appropriate. The Court hereby awards Settlement
24 Administration Costs in the amount of the \$8,827 to Analytics Consulting LLC in accordance
25 with the terms of the Settlement Agreement.

26 16. This Court retains jurisdiction over the Plaintiffs, each Participating Settlement
27 Class Member, and Defendants, to enforce the terms of the Settlement Agreement and this Final
28 Approval Order.

17. A Status Conference is set for October 31, 2025 at 11:00 a.m. A status report, accompanied by an admissible evidentiary declaration, must be filed no later than five court days prior to the status conference. The status report shall set forth a summary accounting of the Gross Settlement Amount identifying distributions made as ordered herein, the number of uncashed checks, the total amount and status of residual funds, and the status of any unresolved issues.

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

IT IS SO ORDERED.

Dated: March/9, 2025


Ethan P. Schulman
Judge of the Superior Court

CERTIFICATE OF ELECTRONIC SERVICE
(CCP 1010.6(6) & CRC 2.260(g))

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

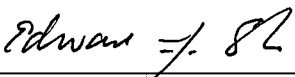
On March 14, 2025, I electronically served:

ORDER GRANTING (1) FINAL APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT AND (2) ATTORNEY'S FEES, COSTS, AND CLASS REPRESENTATIVE
SERVICE AWARDS

via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Dated: MAR 14 2025

Brandon E. Riley, Court Executive Officer

By: 
Edward Santos, Deputy Clerk