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Attorneys for Plaintiffs and the Putative Classes

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

QUINCY GRIFFIN PERKINS, JOSE
JOHNSON, IGNACIO PARKS, AND
TIWAN JOHNSON, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

HADCO METAL TRADING
SANTA FE SPRINGS CA dba
RYDER INTEGRATED
LOGISTICS INC.: and DOES 1-50,
inclusive,

Defendants.

Lead Case No. 3:23-cv-00502-WHO
[Consolidated for all purposes with Case
No. 3:23-cv-01694-WHO & Case No.
4:22-cv-07456-JST]

[Assigned to the Honorable William H.
Orrick]

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT AND
ATTORNEY FEES AND COSTS**

Date: December 10, 2024
Time: 10:00 a.m.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 10, 2024, at 10:00 a.m., or as soon thereafter as the matter may be heard, before the Honorable William H. Orrick in Courtroom 2 of this Court, located at 450 Golden Gate Avenue, San Francisco, CA 94102, Plaintiffs Quincy Griffin Perkins, Jose Johnson, Ignacio Parks, and Tiwan Johnson (“Plaintiffs”) will seek an Order:

- (1) Granting Final Approval of the Class and PAGA Action Settlement;
- (2) Approving the request for attorneys’ fees to Class Counsel of 1/3 of the Gross Settlement Amount, totaling \$983,333.33;
- (3) Approving reimbursement of actual litigation costs of \$37,491.38; and
- (4) Approving the Class Representative Enhancement Payments totaling \$60,000.00 to Plaintiffs for the time and effort spent pursuing this matter on behalf of the Settlement Class, the risks taken and in recognition of the general release they have entered into as part of this Settlement; and
- (5) Approving the Administration fee request totaling \$63,750.00 to the Settlement Administrator ILYM Group, Inc in connection with the administration of the settlement.

This Motion is based on this Notice of Motion, the following Memorandum of Points and Authorities, the Declarations of James R. Hawkins and Mehrdad Bokhour in support of Final Approval, the Declarations of Plaintiffs Quincy Griffin Perkins, Jose Johnson, Ignacio Parks, and Tiwan Johnson previously submitted in support of Preliminary Approval, the Declaration of settlement administrator Nathalie Hernandez on behalf of ILYM Group Inc., and all other records, pleadings, and papers on file in this action and such other evidence or argument as may be presented to the Court at the hearing on this Motion.

The Parties have met and conferred pursuant to 7-3 regarding the substance of the motion, and Plaintiffs do not anticipate an objection to this motion from Defendant.

Respectfully submitted,
JAMES HAWKINS APLC
BOKHOUR LAW GROUP, P.C.
FALAKASSA LAW, P.C.

DATED: November 5, 2024

By: /s/ Gregory Mauro

James R. Hawkins

Gregory Mauro

Mehrdad Bokhour

Joshua Falakassa

Attorneys for Plaintiffs and the
Settlement Class