

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

GABRIEL TOPPING, MADISON DE LA
CRUZ, WILLIAM HUBERT, PARKER
KENDLE, CHRISTOPHER LIEU, DEAVIN
RENCER, DANIEL ROVICK, ETHAN
ROVICK, AND MACLAINE SCHER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

DRATA INC.,

Defendant.

MOTION SEQ. NO. 001

Index No.: 606167/2026

~~PROPOSED~~ **AGREED ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION
FOR APPROVAL OF SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND SERVICE AWARDS**

This matter came before the Court upon Plaintiffs' Unopposed Motion for Approval of

 Settlement, Attorneys' Fees and Costs, and Service Awards (the "Motion"). Having reviewed the affirmation of Melissa L. Stewart, Esq. in support, the Motion, the exhibits attached thereto, and the Settlement Agreement and Release and Plaintiffs' Memorandum of Law in Support ("Agreement"), and the Court being otherwise fully advised in the premises, it is ORDERED

AND ADJUDGED as follows:

1. The Court certifies, for settlement purposes only, the Class as defined in the Agreement and finds that the prerequisites and considerations of New York Civil Practice Law and Rules ("CPLR") § 901 and § 902 are satisfied.
2. The Court certifies the Fair Labor Standards Act Collective for settlement purposes only under 29 U.S.C. § 216(b).

3. The Court approves the Parties' Settlement Agreement and Release as fair, adequate, and reasonable, and so orders its terms which are incorporated in this Approval Order. Capitalized terms used in this Approval Order have the same meaning as set forth in the Agreement, unless defined otherwise.

4. The Court approves the proposed Notice of Proposed Class Action Settlement for Class Members and Notice of Proposed Collective Action Settlement for Putative Collective Members, the Reminder forms, and the plan for their distribution.

5. The Court approves the Service Awards to Plaintiffs Gabriel Topping, Madison De La Cruz, William Hubert, Parker Kendle, Christopher Lieu, DeAvin Rencher, Daniel Rovick, Ethan Rovick, and Maclaine Scher in the amounts requested.

6. The Court appoints Plaintiffs' Counsel, Outten & Golden LLP and Werman Salas PC, as Class Counsel for purposes of effectuating the settlement.

7. The Court approves Plaintiffs' Counsel's request for attorneys' fees and reimbursement of out-of-pocket costs.

8. The Court approves Apex Class Action as the Settlement Administrator.

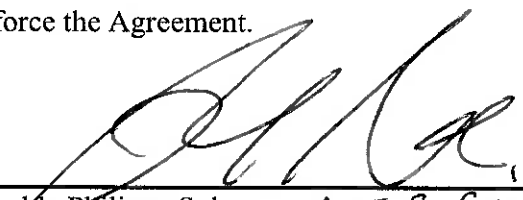
9. The Court shall retain discretion to schedule a hearing, including in the event any member of the Class objects to the Settlement. Plaintiffs' Counsel shall promptly notify the Court and Defendant of any Objections received. Should the Court opt to schedule a hearing for this purpose, upon the scheduling of a hearing date, Plaintiffs' Counsel shall notify the Objector via First-Class U.S. Mail of the date, time, and location of the hearing. The Parties may file with the Court written responses to any filed Objections no later than three days before the hearing. If a hearing is held, the Agreement shall become effective as of the Final Effective Date as defined in Section 1.21 of the Agreement.

10. The Parties shall abide by the terms of the Agreement.

11. Upon the Final Effective Date, as defined by the Agreement Section 1.21, this Action shall be dismissed with prejudice.

12. The Court retains jurisdiction to enforce the Agreement.

Dated: July 14, 2026



Honorable Philippe Solages, A.J.S.C.