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11 Attorneys for Denise Antoinette Chandler and Karla Reyes,
12 individually and on behalf of all others similarly situated.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF STANISLAUS**

15 DENISE ANTOINETTE CHANDLER,
16 individually and on behalf of all others
17 similarly situated,

18 Plaintiff,

19 vs.

20 COMPASS GROUP USA, INC.; and
21 DOES 1 through 20, inclusive,

22 Defendants.

Case No. CV-23-003352

*Assigned for all purposes to
Hon. John D Freeland
Dept. 23*

**~~PROPOSED~~ ORDER GRANTING
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AND ENTERING
JUDGMENT**

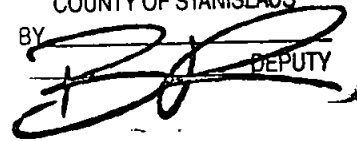
Date: August 14, 2024
Time: 8:30 a.m.
Dept.: 23

FILED

AUG 14 2024

CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS

BY

 DEPUTY

1 The Court has received and considered the joint stipulation of Plaintiffs Denise Antoinette
2 Chandler and Karla Reyes, as individuals, and on behalf of the people of the State of California
3 and as an “aggrieved employees” acting as a private attorney general under the Labor Code
4 Private Attorneys General Act of 2004, § 2699, *et seq.* (“PAGA”) and Defendant Compass Group
5 USA, Inc. in the above-captioned action.

6 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

7 The Judgment incorporates by reference the definitions in the PRIVATE ATTORNEYS
8 GENERAL ACT SETTLEMENT AGREEMENT (the “Settlement”), a copy of which is attached
9 as Exhibit 1 to the Declaration of Namrata Kaur In Support of Plaintiffs’ Motion for Approval of
10 Private Attorneys General Act Representative Action Settlement, and all terms defined therein
11 shall have the same meaning as set forth in the Settlement.

12 The Court hereby approves the Parties’ proposed Settlement and hereby enters FINAL
13 JUDGMENT based on the terms set forth in the Parties’ Settlement in favor of Plaintiff and the
14 Aggrieved Employees in the amount of \$1,050,000.00. Of this, \$350,000.00 is awarded as
15 attorney fees paid to Plaintiff’s Counsel, \$21,876.75 (combined) is awarded as costs paid to
16 Plaintiffs’ Counsel, \$10,000.00 each is awarded to Plaintiffs in exchange for a General Release,
17 and \$8,830.00 is awarded as administrative costs paid to the Settlement Administrator. Of the
18 remaining Net Settlement Amount, 75% shall be paid to the Labor and Workforce Development
19 Agency and 25% shall be paid to the Aggrieved Employees as set forth in the Settlement
20 Agreement.

21 The Court hereby approves, as to form and content, the notice to be distributed to the
22 PAGA Employees, attached to the Settlement as Exhibit A.

23 As of the date of entry of this Order, the State of California and the Aggrieved Employees
24 will release the “Released Parties” meaning “Defendant and each of its former and present
25 directors, officers, shareholders, owners, members, attorneys, insurers, predecessors, successors,
26 assigns, subsidiaries, and affiliates,” from “from all claims for PAGA Penalties that were alleged,
27 or reasonably could have been alleged, based on the facts stated in the Actions and the PAGA
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1 Notices.

2 A Final Non-Appeal Hearing is set for April 10, 2025 at 8:30
3 a.m./p.m. before this Court. The administrator is to file a declaration no later than 5 court days in
4 advance to confirm that the distribution of funds is complete, including any distribution to the
5 State Controller per the settlement agreement. If distribution efforts are not complete, counsel
6 shall call the clerk and reschedule.

7 This Judgment is intended to be a final disposition in its entirety of the above captioned
8 action. Without affecting the finality of this judgment in any way, the Court retains jurisdiction
9 of all matters relating to the interpretation, administration, implementation, effectuation, and
10 enforcement of the Settlement pursuant to C.C.P. § 664.6.

11 IT IS SO ORDERED.

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13 Dated: 8/14/24

J. Freeland
14 Hon. John D Freeland
15 Judge of the Superior Court
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