LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
Tiara Gose-Hardy (SBN 323823)
tgose@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
DEON GENTRY, JR.

[*Additional counsel on Page 3*]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

DEANDRE PIERCE, on behalf of himself, all others similarly situated, and on behalf of the general public,

Plaintiff,

v.

QUALITY DRIVE AWAY, INC., an Indiana corporation; and DOES 1-100, inclusive,

Defendants.

DEON GENTRY and DEON GENTRY, JR., as individuals and on behalf of all other Aggrieved Employees,

Plaintiffs,

v.

QUALITY DRIVE AWAY, INC., an Indiana

Case No. CIVSB2313410
[Consolidated with Case. No. CIVSB2322025]

Assigned for all purposes to Hon. Joseph T. Ortiz, Dept. S17

[PROPOSED] ORDER GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CLASS REPRESENTATIVES' SERVICE AWARDS, AND ATTORNEYS' FEES AND COSTS

Date: December 15, 2026
Time: 1:30 p.m.
Dept.: S-17

corporation; and DOES 1 through 100, inclusive,

Defendants.

ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

David Mara, Esq. (SBN 230498)
Carter Cordura, Esq. (SBN 359252)
MARA LAW FIRM, PC
3160 Camino Del Rio South, Suite 207
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048

Attorneys for Plaintiff
DEANDRE PIERCE

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
DEON GENTRY, JR.

This matter came on regularly for hearing before this Court on December 15, 2026, pursuant to California Rule of Court 3.769 and this Court's August 24, 2026 Order Granting Preliminary Approval of Class Action Settlement ("Preliminary Approval Order"). Having considered the parties' Stipulation of Class Action and PAGA Settlement (herein "Settlement")[1] and the documents and evidence presented in support thereof, and recognizing the disputed factual and legal issues involved in this case, the risks of further prosecution and the substantial benefits to be received by the Settlement Class pursuant to the Settlement, the Court hereby makes a final ruling that the proposed Settlement is fair, reasonable, and adequate, and is the product of good faith, arm's-length negotiations between the parties. Good cause appearing therefor, the Court hereby GRANTS Plaintiffs' Motion for Final Approval of Class Action Settlement and ORDERS as follows:

1. The conditional class certification contained in the Preliminary Approval Order is hereby made final, and the Court thus certifies, for purposes of the Settlement only, a Settlement Class defined as:

> All drivers who contracted with Defendant, were assigned a home terminal in the State of California and were classified as independent contractors at any time from June 12, 2019, to May 11, 2026.

2. The PAGA Aggrieved Employees are defined as:

> All drivers who contracted with Defendant, were assigned a home terminal in the State of California and were classified as independent contractors at any time from June 22, 2022, to May 11, 2026.

3. Plaintiff Deandre Pierce and Plaintiff Deon Gentry, Jr. are hereby confirmed as Class Representatives, and Scott M. Lidman, Milan Moore, and Tiara Gose-Hardy of Lidman Law, APC; David Mara and Carter Cordura of Mara Law Firm, PC; and Paul K. Haines of Haines Law Group, APC are hereby confirmed as Class Counsel.

4. Notice was provided to the Settlement Class as set forth in the Settlement. The form and manner of notice were approved by the Court on September 9, 2026, and the notice process has been

[1] Unless otherwise indicated, all terms used in this Order shall have the same meaning as that assigned to them in the Settlement.

completed in conformity with the Court's Order. The Court finds that said notice was the best notice practicable under the circumstances. The Notice Packet (which consists of the Notice of Pendency of Class Action and Proposed Settlement and Notice of Individual Settlement Award) provided due and adequate notice of the proceedings and matters set forth therein, informed Settlement Class members of their rights, and fully satisfied the requirements of California Code of Civil Procedure § 1781(e), California Rule of Court 3.769, and due process.

5. The Court finds that no Settlement Class member objected to the Settlement, no class members have opted out of the Settlement, and that the 100% participation rate in the Settlement supports final approval.

6. The Court hereby approves the settlement as set forth in the Settlement Agreement as fair, reasonable, and adequate, and directs the parties to effectuate the Settlement Agreement according to its terms.

7. For purposes of settlement only, the Court finds that (a) the members of the Settlement Class are ascertainable and so numerous that joinder of all members is impracticable; (b) there are questions of law or fact common to the Settlement Class, and there is a well-defined community of interest among members of the Settlement Class with respect to the subject matter of the litigation; (c) the claims of the Class Representatives are typical of the claims of the members of the Settlement Class; (d) the Class Representatives have fairly and adequately protected the interests of the Settlement Class members; (e) a class action is superior to other available methods for an efficient adjudication of this controversy; and (f) Class Counsel are qualified to serve as counsel for the Class Representatives and the Settlement Class.

8. The Court finds that given the absence of objections to the Settlement, and objections being a prerequisite to appeal, that this Order shall be considered final as of the date of notice of entry.

9. The Court orders that Defendant deposit the Gross Settlement Amount of $2,000,000.00 with Phoenix Settlement Administrator, the Settlement Administrator, as provided for in the Settlement. Specifically, Defendant shall deposit the Gross Settlement Amount with the Settlement Administrator in three major installments with the first installment due within thirty (30) days after the Effective Date.

10. Any funds payable to Settlement Class members whose checks were not cashed within 180 days after mailing will escheat to the California Secretary of State- Unclaimed Property Fund under the unclaimed property laws in the name of the Settlement Class member. Any uncashed funds from the PAGA Amount shall be handled in the same manner.

11. The Court finds that the settlement payments, as provided for in the Settlement, are fair, reasonable, and adequate, and orders the Settlement Administrator to distribute the individual payments in conformity with the terms of the Settlement.

12. The Court finds that an incentive payment in the amount of $20,000.00 for Plaintiff Deandre Pierce is appropriate for his risks undertaken and service to the Settlement Class. The Court finds that this award is fair, reasonable, and adequate, and orders that the Settlement Administrator make this payment in conformity with the terms of the Settlement.

13. The Court finds that an incentive payment in the amount of $20,000.00 for Plaintiff Deon Gentry, Jr. is appropriate for his risks undertaken and service to the Settlement Class. The Court finds that this award is fair, reasonable, and adequate, and orders that the Settlement Administrator make this payment in conformity with the terms of the Settlement.

14. The Court finds that attorneys' fees in the amount of $700,000.00 and litigation costs of $44,504.40 for Class Counsel, are fair, reasonable, and adequate, and orders that the Settlement Administrator distribute these payments to Class Counsel in conformity with the terms of the Settlement.

15. The Court orders that the Settlement Administrator shall be paid $11,175.00 from the Gross Settlement Amount for all of its work done and to be done until the completion of this matter, and finds that sum appropriate.

16. For purposes of calculating applicable taxes and withholdings, each Settlement Award shall be allocated as follows: 10 percent as wages and 90 percent as non-wages (i.e., reimbursement, penalties, and interest).

17. The Court finds and determines that the payment to the Labor and Workforce Development Agency ("LWDA"), in the sum of $56,250.00 (which is 75% of the $75,000 allocated to claims under PAGA), is fair and reasonable. The Court hereby orders the Settlement Administrator to

make the payment to the LWDA in the amount of $56,250.00 for the PAGA payment in accordance with the terms of the Settlement. The Court orders that the remaining amount of $18,750 be distributed to PAGA Employees in accordance with the terms of the Settlement.

18. The Court finds and determines that upon satisfaction of all obligations under the Settlement and this Order, all Settlement Class Members, will be bound by the Settlement, will have released the Released Claims as set forth in the Settlement, and will be permanently barred from prosecuting against Defendant any of the Released Claims pursuant to the Settlement.

19. The Court finds and determines that upon satisfaction of all obligations under the Settlement and this Order, all PAGA Employees shall be deemed and are deemed to have conclusively released and forever discharged the Released Parties from the Released PAGA Claims, as defined in the Settlement.

20. The Settlement is not an admission by Defendant nor is this Order a finding of the validity of any allegations or of any wrongdoing by Defendant. Neither this Order, the Settlement, nor any document referred to herein, nor any action taken to carry out the Settlement, shall be construed or deemed an admission of liability, culpability, or wrongdoing on the part of Defendant.

18. The Court will retain jurisdiction to enforce the Settlement, this Final Approval Order, and the Judgment entered in connection with the Settlement.

19. The Settlement Administrator shall file a declaration regarding the disbursement of Settlement funds on or before December 15, 2027.

IT IS SO ORDERED.

Dated: _____, 2026

_____
Honorable Joseph T. Ortiz
Judge of the Superior Court