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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

ELISA RECODER, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ADECCO USA, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CGC-23-610955

**[PROPOSED] ORDER APPROVING
SETTLEMENT AND JUDGMENT THEREON**

Date: August 18, 2025

Time: 9:00 a.m.

Dept.: 301

Action Filed: December 8, 2023

Trial Date: September 8, 2025

1 The motion of Plaintiff Elisa Recoder (“Plaintiff”) for an order approving the settlement
2 of the above-captioned action and entering judgment thereon (“Motion”) having come before the
3 Court, and the Court being duly apprised of the premises, and GOOD CAUSE appearing,

4 **IT IS HEREBY ORDERED** that the Motion shall be and is granted and the settlement
5 of this action is hereby approved.

6 **IT IS FURTHER ORDERED** as follows:

7 1. Capitalized terms in this Approval Order shall have the same meaning they are
8 given in the PAGA Settlement Agreement attached as **Exhibit B** to the Declaration of Max W.
9 Gavron filed in support of the Motion;

10 2. Phoenix Settlement Administrators is approved to serve as the Settlement
11 Administrator and is hereby authorized to perform all of the duties assigned to it in the
12 Settlement Agreement and to disburse the following from the Settlement Fund in accordance
13 with the terms of the Settlement Agreement:

14 a. The LWDA Payment in the amount of \$23,178.88 (which accounts for the
15 difference between the estimated costs from the Fee and Expense Award
16 and those actually incurred);

17 b. The PAGA Group Members Payment in the aggregate amount of
18 \$7,726.29 (which accounts for the difference between the estimated costs
19 from the Fee and Expense Award and those actually incurred);

20 c. The Fee and Expense Award in the amount of \$42,586.67 in fees, and
21 \$13,508.16 in costs;

22 d. The Service Payment in the amount of \$5,000.00; and

23 e. The Settlement Administration Costs in the amount of \$30,000.00.

24 3. The State of California and all PAGA Group Members (including Plaintiff) are
25 hereby deemed to have, and by operation of this Approval Order and Judgment shall have,
26 expressly released, waived, and discharged the Released Parties from the Released Claims, and
27 shall be bound by this Approval Order and Judgment and be forever barred from suing the
28 Released Parties on any of the Released Claims.

4. Judgment shall be entered forthwith in accordance with the foregoing, with each party to pay her or its own attorneys' fees and costs except as expressly set forth in the Settlement Agreement.

5. The Court shall retain jurisdiction for purposes of ensuring compliance with the terms of the Agreement and this Order, pursuant to Code of Civil Procedure § 664.6.

6. The Court sets a Final Distribution Hearing for _____, 2026,
at _____ a.m./p.m., in Department _____. Fourteen (14) calendar days prior to
the hearing, Plaintiff shall file a declaration from the settlement administrator detailing the
distribution.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

Dated: _____, 2025

HON. CHRISTINE VAN AKEN
SUPERIOR COURT OF CALIFORNIA