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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

NORA MONTENEGRO, individually, and
on behalf of other members of the general
public similarly situated

Plaintiff

v.

CONSTELLIS INTEGRATED RISK
MANAGEMENT SERVICES, INC., a
Delaware Corporation; CENTERRA
GROUP, LLC, a Delaware Limited Liability
Company; CENTERRA SERVICES
INTERNATIONAL, INC., a Delaware
Corporation; and DOES 1-10, inclusive

Defendants

CASE NO. 37-2024-00011032-CU-OE-CTL

**PROPOSED] ORDER: (1) GRANTING
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND (2) ENTERING
JUDGMENT**

Date: January 9, 2026
Time: 10:30 a.m.
Judge: Hon. Carolyn M. Caietti
Dept.: C-70

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Plaintiff NORA MONTENEGRO, individually, and on behalf of other members of the general
3 public similarly situated Unopposed Motion for Final Approval of (1) Class Action Settlement; (2)
4 Attorneys' Fees and Costs; and (3) Class Representative Enhancement, in the above-captioned matter,
5 came on for hearing before this Court on January 9, 2026, at 10:30 a.m. Sullivan & Yaeckel Law
6 Group, APC appeared on behalf of Plaintiff and the Class. McGuire Woods LLP appeared on behalf
7 of Defendant CENTERRA SERVICES INTERNATIONAL, INC (hereinafter, "CSI" or "Defendant").
8 On good cause shown, and pursuant to the authority of California statutory and case law, this Court
9 finds that the settlement between Plaintiff and Defendant was made in good faith and is fair,
10 reasonable and adequate. The Court grants the motion and enters judgment consistent with the
11 following:

12 **IT IS HEREBY ORDERED THAT:**

- 13 1. Plaintiff's Motion for Final Approval of (1) Class Action Settlement; (2) Attorneys' Fees and
14 Costs; and (3) Class Representative Enhancement Award, is hereby granted.
- 15 2. Pursuant to this Court's Preliminary Approval Order of September 29, 2025, the Notice of
16 Class Action Settlement (the "Class Notice") was sent to the Class, which was previously
17 certified in this Court's Preliminary Approval Order, in the manner specified by the parties
18 Joint Stipulation of Class Action Settlement and Release ("Settlement Agreement."). (The
19 Settlement Agreement is on file with the Court's Register of Actions as **Exhibit A**, ROA #29.)
20 The Class Notice informed the Class of the terms of the Settlement, their right to receive their
21 proportional share of the Settlement by not opting out, their right to request exclusion, and their
22 right to object to the Settlement. Adequate periods of time were provided by each of these
23 procedures.
- 24 3. Out of a total of 231 Class Members who were sent notice, seven (7) have requested exclusion
25 and "Opted-Out" of the settlement.
- 26 4. Zero (0) members of the Class objected to the Settlement.
- 27 5. The Court finds and determines that this notice procedure afforded adequate protections to
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- 1 Class Members and fully and accurately informed the class of all material aspects of the
2 settlement. The Court finds the and determines that the notice provided in this case was the
3 best notice practicable, which satisfied the requirements of law and due process.
- 4 6. The Court further finds and determines that the terms of the Settlement are fair, reasonable and
5 adequate to the Class and to each Class Member. The Class Members who have not expressly
6 sent a request for exclusion (“Opt-Out”), will be bound by the Settlement. The Settlement is
7 ordered finally approved, and that all terms and provisions of the Settlement should be and
8 hereby are ordered to be consummated.
- 9 7. The Court finds and determines that the Settlement sums to be paid to the Class Members as
10 provided for by the Settlement are fair and reasonable. The Court hereby gives final approval
11 to and orders the payment of those amounts be made to the Class Members in accordance with
12 the terms of the Settlement.
- 13 8. The Court finds the payment of \$22,500.00 (75% Share of \$30,000.00 allocation) to the Labor
14 and Workforce Development Agency (“LWDA”) in settlement of the LWDA’s share of the
15 penalties alleged by Plaintiff and compromised under the Settlement is fair and reasonable.
- 16 9. The Court finds and determines that the Class Representative Enhancement Payment to
17 Plaintiff, Ms. Montenegro, in the sum of \$7,500.00, in consideration for her service as the
18 Class Representative, is fair and reasonable. The Court hereby gives final approval to and
19 orders that the payment of the Enhancement be paid as provided by the Settlement Agreement.
- 20 10. The Court finds and determines that the total payment to the Claims Administrator, CAC
21 Services Group, LLC, in the sum of \$5,366.00 for claims administration expenses in
22 completing its duties pursuant to the terms of the Settlement is fair and reasonable. The Court
23 hereby gives final approval to and orders that the payment of said amount be paid from the as
24 provided for by the Settlement Agreement.
- 25 11. The Court finds and determines that the payment of \$123,333.33 as Class Counsel’s Attorneys’
26 Fees and request for \$9,512.75 for costs of litigation, is fair and reasonable. The Court hereby
27 gives final approval to and orders those amount(s).
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12. All “Released Claims” against Defendants by the “Class Members”(as these terms are defined the parties’ Settlement Agreement) that have been, or might have been, asserted by any Class Member who did not timely submit a Request for Exclusion, in accordance with the terms of the Settlement Agreement, are hereby released, and all such Class Members shall be forever barred from pursuing any of the Released Claims as set forth in the Settlement Agreement against the Released Parties.

13. Accordingly, the Court enters this judgment consistent with the above and the parties’ Settlement Agreement.

14. Pursuant to California Rules of Court, rule 3.769(h), this Court retains jurisdiction over the parties to enforce this judgment.

15. The Court will set a status conference for _____, 2026 at _____ to confirm the completion of the settlement process.

IT IS SO ORDERED.

Dated: _____

HON. CAROLYN CAIETTI
JUDGE OF THE SUPERIOR COURT