

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
MARIA ELENA GONZALEZ

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

Attorneys for Plaintiff
MARIA ELENA GONZALEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MARIA ELENA GONZALEZ, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

STRATASYS DIRECT, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 23STCV30659

*[Assigned for all purposes to Hon. William F.
Highberger, Dept. SSC-10]*

**[PROPOSED] ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS REPRESENTATIVE
SERVICE AWARD, AND ATTORNEYS' FEES
AND COSTS**

Date: August 31, 2026
Time: 11:00 a.m.
Dept: SSC-10

1 This matter came on regularly for hearing before this Court on August 31, 2026, pursuant to
2 California Rule of Court 3.769 and this Court’s April 22, 2026 Order Granting Preliminary Approval of
3 Class Action Settlement (“Preliminary Approval Order”). Having considered the parties’ Class Action
4 and PAGA Settlement Agreement (herein “Settlement”)¹ and the documents and evidence presented in
5 support thereof, and recognizing the disputed factual and legal issues involved in this case, the risks of
6 further prosecution and the substantial benefits to be received by the Settlement Class pursuant to the
7 Settlement, the Court hereby makes a final ruling that the proposed Settlement is fair, reasonable, and
8 adequate, and is the product of good faith, arm’s-length negotiations between the Parties. Good cause
9 appearing therefor, the Court hereby GRANTS Plaintiff’s Motion for Final Approval of Class Action
10 Settlement and ORDERS as follows.

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

14 All current and former non-exempt employees who worked for Defendant within
15 the State of California during the Class Period.

16 The Class Period is the period from April 15, 2022 to April 22, 2026.

17 2. Plaintiff Maria Elena Gonzalez is hereby confirmed as Class Representative, and Scott
18 M. Lidman, Milan Moore, and Tiara Gose-Hardy of Lidman Law, APC and Paul K. Haines of Haines
19 Law Group, APC are hereby confirmed as Class Counsel.

20 3. Notice was provided to the Settlement Class as set forth in the Settlement. The form and
21 manner of notice were approved by the Court on April 22, 2026 and the notice process has been
22 completed in conformity with the Court’s Order. The Court finds that said notice was the best notice
23 practicable under the circumstances. The Court Approved Notice of Class Action and PAGA Settlement
24 and Hearing Date for Final Court Approval (“Class Notice”) provided due and adequate notice of the
25 proceedings and matters set forth therein, informed Settlement Class members of their rights, and fully
26 satisfied the requirements of California Code of Civil Procedure § 1781(e), California Rule of Court
27 3.769, and due process.

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

1 4. The Court finds that no Settlement Class member objected to the Settlement, no
2 Settlement Class Member has opted out of the Settlement, and that the 100 percent participation rate in
3 the Settlement supports final approval.

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

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

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

18 8. The Court orders that Defendant Stratasys Direct, Inc. deposit the Gross Settlement
19 Amount in the amount of One Hundred Ninety Thousand Dollars and Zero Cents (\$190,000.00) with
20 Phoenix Settlement Administrators (“Phoenix”), the Settlement Administrator, as provided for in the
21 Settlement. Specifically, Defendant shall fully fund the Gross Settlement Amount, and also fund the
22 amounts necessary to fully pay Defendant’s share of payroll taxes, by transmitting the funds to the
23 Administrator no later than 14 days after the Effective Date. The Effective Date is the date by when all
24 of the following events have occurred: (1) the Stipulation of Settlement has been executed by all
25 Parties, Class Counsel and Defense Counsel; (2) the Court has given preliminary approval to the
26 Stipulation of Settlement; (3) the Notice of Class Action Settlement has been given to the putative
27 members of the Settlement Class, providing them with an opportunity to object to the terms of the
28

1 Stipulation of Settlement or opt-out of the settlement; (4) the Court has held a final fairness hearing
2 and entered a final Order and Judgment certifying the Settlement Class and approving the Stipulation
3 of Settlement; and (5) sixty-five (65) days have passed since the Court has entered a final Order and
4 Judgment certifying the Settlement Class and approving the Stipulation of Settlement; and (6) in the
5 event there are objections to the Stipulation of Settlement raised prior to or during the final fairness
6 hearing which are not later withdrawn, the later of the following events: five (5) business days after
7 the period for filing any appeal, writ or other appellate proceeding opposing the Court's final Order
8 approving the Stipulation of Settlement has elapsed without any appeal, writ or other appellate
9 proceeding having been filed; or, if any appeal, writ or other appellate proceeding opposing the
10 Court's final Order approving the Stipulation of Settlement has been filed, five (5) business days
11 after any appeal, writ or other appellate proceedings opposing the Stipulation of Settlement has been
12 finally and conclusively dismissed with no right to pursue further remedies or relief.

13 9. Any Settlement funds that remain uncashed after 180 calendar days after they are mailed
14 shall be delivered to the California State Controller's Office – Unclaimed Property Fund in the name of
15 the Settlement Class member.

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

19 11. The Court finds that an incentive payment in the amount of \$7,500.00 for Plaintiff Maria
20 Elena Gonzalez is appropriate for her risks undertaken and service to the Settlement Class. The Court
21 finds that this award is fair, reasonable, and adequate, and orders that the Settlement Administrator make
22 this payment in conformity with the terms of the Settlement.

23 12. The Court finds that attorneys' fees in the amount of \$63,333.33 and litigation costs of
24 \$20,942.04 for Class Counsel, are fair, reasonable, and adequate, and orders that the Settlement
25 Administrator distribute these payments to Class Counsel in conformity with the terms of the Settlement.
26 The fee award is appropriate in light of the benefit provided to the class.

1 13. The Court orders that the Settlement Administrator shall be paid \$7,500.00 from the
2 Gross Settlement Amount for all of its work done and to be done until the completion of this matter, and
3 finds that sum appropriate.

4 14. The Court finds that the payment to the California Labor & Workforce Development
5 Agency (“LWDA”) in the amount of \$15,000.00 for its 75 percent share of the \$20,000.00 settlement
6 of Plaintiff’s representative action under the California Labor Code Private Attorneys General Act
7 (“PAGA”) is fair, reasonable, and adequate, and orders the Settlement Administrator to distribute this
8 payment to the LWDA in conformity with the terms of the Settlement. The remaining 25 percent or
9 \$5,000.00 of the PAGA Amount is to be distributed to the 138 PAGA Employees in conformity with
10 the terms of the Settlement. The highest Individual PAGA Payment to be paid is approximately \$184.49,
11 and the average Individual PAGA Payment to be paid is approximately \$36.23.

12 15. After the above deductions, attorneys’ fees (\$63,333.33), attorneys’ litigation costs
13 (\$20,942.04), incentive payment to Plaintiff (\$7,500.00), Settlement Administrator costs (\$7,500.00),
14 and the PAGA Penalties (\$20,000.00), the Net Settlement Amount of \$70,724.63 is to be distributed to
15 154 Settlement Class members, that worked a total of 9,166 workweeks during the Class Period, in
16 conformity with the terms of the Settlement. The highest Individual Class Settlement Payment to be
17 paid is approximately \$2,456.85, the lowest Individual Class Settlement Payment to be paid is
18 approximately \$2.34, while the average Individual Class Settlement Payment to be paid is approximately
19 \$459.25.

20 16. Pursuant to the terms of the Settlement, the employer’s share of payroll taxes for the
21 portion of the Gross Settlement Amount allocated to wages shall be paid by Defendant separately from,
22 and in addition to, the Gross Settlement Amount.

23 17. The Court finds and determines that upon satisfaction of all obligations under the
24 Settlement and this Order, all Settlement Class Members will be bound by the Settlement, will have
25 released the Released Class Claims as set forth in the Settlement, and will be permanently barred from
26 prosecuting against Defendant any of the Released Class Claims pursuant to the Settlement.
27
28

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

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

7 20. The Settlement Administrator shall file a declaration regarding the disbursement of
8 Settlement funds on or before April 16, 2027. A NACR re: filing of distribution declaration is set for
9 April 23, 2027.

10 **IT IS SO ORDERED.**

11
12 Dated: _____, 2026

Honorable William F. Highberger
Judge of the Superior Court