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

Archie Shakespeare and Troy Brown, as
individuals, on behalf of themselves and all others
similarly situated and as private attorneys general
pursuant to the Private Attorneys General Act,

Plaintiffs,

vs.

Ameri-Force Craft Services, Inc., National Steel
and Shipbuilding Company, and Does 1 through
10,

Defendants.

Case No. 37-2021-00013962-CU-OE-CTL
CLASS ACTION
*(Assigned to the Hon. Katherine Bacal – Dept.
C-69)*

~~Proposed~~ **Final Order and Judgment**
Approving Class Action Settlement

The hearing on the Motion for Final Approval was held on September 15, 2023 at 1:30 p.m. in Department C-69 before the Honorable Katherine Bacal of the Superior Court of the State of California, County of San Diego, located at 330 W Broadway, San Diego, California 92101. The Court, having reviewed all pleadings, records, and other documentation on file in this case, including the papers filed in support of final approval of Settlement and oral argument of counsel, and good cause appearing therefor, orders as follows:

1. This Final Judgment Approving Class Action Settlement (“Judgment”) incorporates by reference the definitions in the Settlement and Release Agreement (“Settlement”) filed as Exhibit 1 to the Declaration of Peter R. Dion-Kindem in support of the Motion for Preliminary Approval of Class Action Settlement.
2. The Court approves the Settlement and finds that it is fair, reasonable, and adequate.
3. The Court approves the attorney’s fees requested by Class Counsel and orders the payment of \$216,667 as reasonable attorney’s fees to Class Counsel in accordance with the Settlement.
4. The Court finds that the costs incurred by Class Counsel are reasonable and orders the payment of the following costs in accordance with the Settlement:
 - a. To Peter R. Dion-Kindem, P.C. the sum of \$8,176.85;
 - b. To the Blanchard Law Group, APC the sum of \$7,506.25.
5. The Court appoints Archie Shakespeare and Troy Brown as the representatives for the Class and finds that the Incentive Awards to be paid to the Representative Plaintiffs are fair, reasonable, and appropriate given their services rendered in this case and orders the payments of \$10,000 to Archie Shakespeare and Troy Brown in accordance with the Settlement.
6. The Court approves the Settlement Administration Expenses and orders the payment of \$10,500 to the Settlement Administrator in accordance with the Settlement.
7. The Court approves the PAGA Payment of \$30,000 to pay all applicable penalties under the California Private Attorneys General Act of 2004 (the “PAGA”), 75% of which (\$22,500) will be remitted to the Labor Workforce Development Agency and 25% of which (\$7,500) will be distributed to the PAGA Members on a proportional basis based on the number of pay periods worked by each PAGA Member during the PAGA Period.
8. The Court orders the payments to the Settlement Class Members as calculated and provided by the Settlement. Any uncashed checks or other cash residue from the Settlement shall be distributed to National CASA/GAL Association for Children, a nonprofit organization providing services for the benefit of children who have experienced abuse or neglect.

1 9. As of the Effective Date, the Class Representatives will be deemed to have released claims as
2 provided in Section X.C. of the Settlement.


3 10. As of the Effective Date, all Participating Class Members shall be deemed to have released the
4 Released Parties from all “Settlement Class Members’ Released Claims” as defined by Section
5 I.AA. of the Settlement.

6 11. As of the Effective Date, the Release of PAGA Claims as provided in Section X.B. of the
7 Settlement shall take effect.

8 12. Pursuant to California Rule of Court, Rule 3.769(h), and without affecting the finality of this
9 Judgment, the Court retains jurisdiction of all matters relating to the interpretation, administration,
10 implementation, effectuation, and enforcement of the Settlement and this Judgment to the full
11 extent permitted or required by law.

12 JUDGMENT SHALL BE AND HEREBY IS ENTERED.

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14 DATED: **September 19**, 2023

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17 Katherine Bacal, Superior Court Judge
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1 **PROOF OF SERVICE**

2 I am over the age of 18 and not a party to the within action. My business address is 2945
3 Townsgate Road, Suite 200, Westlake Village, CA 91361. On September 15, 2023 , I served the
4 following document(s) described as:

5 **[Proposed] Final Order and Judgment Approving Class Action Settlement**

6 on interested parties in this action addressed as follows:

7 *See attached service list*

8 **(By Mail)** I deposited such envelope with postage thereon fully prepaid in the United States
9 mail at a facility regularly maintained by the United States Postal Service at Los Angeles,
California.

10 xxx **(By Email)** Based on a court order, Rules of Court, or an agreement of the parties to accept
11 electronic service, I caused the documents to be sent to the person(s) at the email addresses set
forth above.

12 **(By Overnight Delivery)** I enclosed the documents in an envelope or package provided by an
13 overnight delivery carrier and addressed to the persons at the address(es) identified above. I
placed the envelope or package for collection and overnight delivery at an office or a regularly
utilized drop box of the overnight delivery carrier.

14 **(By Personal Service)**

By personally delivering copies to the person served.

15 I delivered such envelope by hand to the offices of the addressee pursuant to Code of
16 Civil Procedure Section 1011.

17 I declare under penalty of perjury under the laws of the State of California that the above is true
and correct. Executed on September 15, 2023.

18 

19 _____
20 Kale M. Eaton

Service List

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