

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Edwin Aiwazian (SBN 232943) LAWYERS for JUSTICE, PC 410 Arden Avenue, Suite 203 Glendale, California 91203 TELEPHONE NO.: (818) 265-1020 FAX NO. (Optional): (818) 265-1021 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Joaquin STREET ADDRESS: 180 E Weber Avenue MAILING ADDRESS: 180 E Weber Avenue, Suite 200 CITY AND ZIP CODE: BRANCH NAME: Stockton Courthouse	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
<p style="text-align: center;">NOTICE OF ENTRY OF JUDGMENT OR ORDER</p> <p>(Check one): <input checked="" type="checkbox"/> UNLIMITED CASE <input type="checkbox"/> LIMITED CASE (Amount demanded exceeded \$25,000) (Amount demanded was \$25,000 or less)</p>	CASE NUMBER:

TO ALL PARTIES :

1. A judgment, decree, or order was entered in this action on (date):

2. A copy of the judgment, decree, or order is attached to this notice.

Date:

Edwin Aiwazian

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)


 (SIGNATURE)

EXHIBIT A

✓ by DGA

3/4
11B
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1 Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
2 Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
3 410 West Arden Avenue, Suite 203
Glendale, California 91203
4 Tel: (818) 265-1020 / Fax: (818) 265-1021

FILED **MAR 10 2021**
By Brandon E. Riley
DEPUTY

5 *Attorneys for Plaintiff and the Class*

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN JOAQUIN**

10 MITCHELL MCCHRISTIAN, individually,
and on behalf of other members of the general
11 public similarly situated and on behalf of other
aggrieved employees pursuant to the California
12 Private Attorneys General Act;

13 **Plaintiff,**

14 **vs.**

15 **SCIENTIFIC SPECIALTIES, INC., a**
California corporation; and DOES 1 through
16 100, inclusive,

17 **Defendants.**

Case No.: STK-CV-UOE-2018-0013557

Honorable Roger Ross
Department 11B

CLASS ACTION

**[PROPOSED] FINAL APPROVAL
ORDER AND JUDGMENT**

Date: March 4, 2021
Time: 9:00 a.m.
Department: 11B

Complaint Filed: October 29, 2018
Trial Date: None Set

JAN 27 2021

ROBERT T. WATERS (RW)

1 This matter has come before the Honorable Roger Ross in Department 11B of the above-
2 entitled Court, located at 180 E. Weber Avenue, Stockton, California 95202, on Plaintiff
3 Mitchell McChristian's ("Plaintiff") Motion for Final Approval of Class Action Settlement,
4 Attorneys' Fees, Costs, and Enhancement Payment ("Motion for Final Approval"). Lawyers for
5 Justice, PC appeared on behalf of Plaintiff, and Mayall Hurley, P.C. appeared on behalf of
6 Defendant Scientific Specialties, Inc. ("Defendant").

7 On October 20, 2020, the Court entered the Order Granting Preliminary Approval of
8 Class Action Settlement ("Preliminary Approval Order"), thereby preliminarily approving the
9 settlement of the above-entitled action ("Action") in accordance with the Joint Stipulation of
10 Class Action and PAGA Settlement and Release ("Settlement," "Agreement," or "Settlement
11 Agreement"), which, together with the exhibits annexed thereto, set forth the terms and
12 conditions for settlement of the Action.

13 Having reviewed the Settlement Agreement and duly considered the parties' papers and
14 oral argument, and good cause appearing,

15 **THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS:**

16 1. All terms used herein shall have the same meaning as defined in the Settlement
17 Agreement and the Preliminary Approval Order.

18 2. This Court has jurisdiction over the claims of the Class Members asserted in this
19 proceeding and over all parties to the Action.

20 3. The Court finds that the applicable requirements of California Code of Civil
21 Procedure section 382 and California Rule of Court 3.769, *et seq.* have been satisfied with
22 respect to the Class and the Settlement. The Court hereby makes final its earlier provisional
23 certification of the Class for settlement purposes, as set forth in the Preliminary Approval Order.

24 The Class is hereby defined to include:

25 All current and former hourly-paid or non-exempt employees of Defendant in
26 California at any time during the period from October 29, 2014 through April 3,
27 2020 ("Class" or "Class Members").

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1 4. The Notice of Class Action Settlement (“Class Notice”) that was provided to the
2 Class Members, fully and accurately informed the Class Members of all material elements of the
3 Settlement and of their opportunity to participate in, object to or comment thereon, or to seek
4 exclusion from, the Settlement; was the best notice practicable under the circumstances; was
5 valid, due, and sufficient notice to all Class Members; and complied fully with the laws of the
6 State of California, the United States Constitution, due process and other applicable law. The
7 Class Notice fairly and adequately described the Settlement and provided the Class Members
8 with adequate instructions and a variety of means to obtain additional information.

9 5. Pursuant to California law, the Court hereby grants final approval of the
10 Settlement and finds that it is reasonable and adequate, and in the best interests of the Class as a
11 whole. More specifically, the Court finds that the Settlement was reached following meaningful
12 discovery and investigation conducted by Lawyers *for* Justice, PC (“Class Counsel”); that the
13 Settlement is the result of serious, informed, adversarial, and arms-length negotiations between
14 the parties; and that the terms of the Settlement are in all respects fair, adequate, and reasonable.
15 In so finding, the Court has considered all of the evidence presented, including evidence
16 regarding the strength of Plaintiff’s claims; the risk, expense, and complexity of the claims
17 presented; the likely duration of further litigation; the amount offered in the Settlement; the
18 extent of investigation and discovery completed; and the experience and views of Class Counsel.
19 The Court has further considered the absence of objections to the Settlement submitted by Class
20 Members. Accordingly, the Court hereby directs that the Settlement be affected in accordance
21 with the Settlement Agreement and the following terms and conditions.

22 6. A full opportunity has been afforded to the Class Members to participate in the
23 Final Approval Hearing, and all Class Members and other persons wishing to be heard have been
24 heard. The Class Members also have had a full and fair opportunity to exclude themselves from
25 the Settlement. Accordingly, the Court determines that all Class Members who did not timely
26 and validly opt out of the Settlement (“Settlement Class Member”) are bound by this Final
27 Approval Order and Judgment.

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1 7. The Court finds that Class Member, Quan Pham, has timely and validly opted out
2 of the Settlement and will not be bound by this Final Approval Order and Judgment.

3 8. The Court finds that payment of Settlement Administration Costs in the amount of
4 \$7,000.00 is appropriate for the services performed and costs incurred and to be incurred for the
5 notice and settlement administration process. It is hereby ordered that the Settlement
6 Administrator, Phoenix Settlement Administrators, shall issue payment to itself in the amount of
7 \$7,000.00, in accordance with the terms and methodology set forth in Settlement Agreement.

8 9. The Court finds that the Enhancement Payment sought is fair and reasonable for
9 the work performed by Plaintiff on behalf of the Class. It is hereby ordered that the Settlement
10 Administrator issue payment in the amount of \$10,000.00 to Plaintiff Mitchell McChristian for
11 his Enhancement Payment, according to the terms and methodology set forth in the Settlement
12 Agreement.

13 10. The Court finds that the allocation of \$50,000.00 toward penalties under the
14 California Private Attorneys General Act of 2004 ("PAGA Penalties"), is fair, reasonable, and
15 appropriate, and hereby approved. The Settlement Administrator shall distribute the PAGA
16 Penalties as follows: the amount of \$37,500.00 to the California Labor and Workforce
17 Development Agency, and the amount of \$12,500.00 to be included in the Net Settlement
18 Amount for distribution to Settlement Class Members, according to the terms and methodology
19 set forth in the Settlement Agreement.

20 11. The Court finds that the request for attorneys' fees in the amount of \$421,721.38
21 to Class Counsel falls within the range of reasonableness, and the results achieved justify the
22 award sought. The requested attorneys' fees to Class Counsel are fair, reasonable, and
23 appropriate, and are hereby approved. It is hereby ordered that the Settlement Administrator
24 issue payment in the amount of \$421,721.38 to Class Counsel for attorneys' fees, in accordance
25 with the terms and methodology set forth in the Settlement Agreement.

26 12. The Court finds that reimbursement of litigation costs and expenses in the amount
27 of \$17,071.62 to Class Counsel is reasonable, and hereby approved. It is hereby ordered that the
28 Settlement Administrator issue payment in the amount of \$17,071.62 to Class Counsel for

1 reimbursement of litigation costs and expenses, in accordance with the terms and methodology
2 set forth in the Settlement Agreement.

3 13. The Court hereby enters Judgment by which Settlement Class Member shall be
4 conclusively determined to have given a release of any and all Released Claims against the
5 Released Parties, as set forth in the Settlement Agreement and Class Notice.

6 14. It is hereby ordered that Defendant shall deposit the Total Settlement Amount of
7 \$1,204,918.23 into a qualified settlement account established by the Settlement Administrator
8 within twenty-one (21) calendar days of the Effective Date, in accordance with the terms and
9 methodology set forth in the Settlement Agreement.

10 15. It is hereby ordered that the Settlement Administrator shall distribute Individual
11 Settlement Payments to the Settlement Class Members within seven (7) calendar days after
12 Defendant funds the Total Settlement Amount, according to the methodology and terms set forth
13 in the Settlement Agreement.

14 16. Individual Settlement Payment checks shall remain valid and negotiable for one
15 hundred eighty (180) calendar days from the date the checks are issued, and thereafter, shall be
16 cancelled. The funds associated with such cancelled checks shall be transmitted to Legal Aid at
17 Work.

18 17. After entry of this Final Approval Order and Judgment, pursuant to California
19 Rules of Court, Rule 3.769(h), the Court shall retain jurisdiction to construe, interpret,
20 implement, and enforce the Settlement Agreement and this Final Approval Order and Judgment,
21 to hear and resolve any contested challenge to a claim for settlement benefits, and to supervise
22 and adjudicate any dispute arising from or in connection with the distribution of settlement
23 benefits.

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1 18. Notice of entry of this Final Approval Order and Judgment shall be given to the
2 Class Members by posting a copy of the Final Approval Order and Judgment on Administrator's
3 website for a period of at least sixty (60) calendar days after the date of entry of this Final
4 Approval Order and Judgment. Individualized notice is not required.

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6 Dated: 3/10/2020


7 HONORABLE ~~ROGER ROSS~~ ROBERT T. WATERS
8 JUDGE OF THE SUPERIOR COURT

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1 **PROOF OF SERVICE**

2 *STATE OF CALIFORNIA, COUNTY OF LOS ANGELES*

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action. My business address is 410 West Arden Avenue, Suite 203,
5 Glendale, California 91203.

6 On March 17, 2021, I served the foregoing document(s) described as: **NOTICE OF**
7 **ENTRY OF JUDGMENT OR ORDER** on interested parties in this action by emailing a true
8 and correct copy thereof, addressed as follows:

8 William J. Gorham III (*WGorham@mayallaw.com*)
9 Vladimir J. Kozina (*VJKozina@mayallaw.com*)
10 **MAYALL HURLEY, A PROFESSIONAL CORPORATION**
11 2453 Grand Canal Boulevard
12 Stockton, California 95207

11 Mark S. Adams (*madams@adamsemploymentlawyer.com*)
12 **LAW OFFICES OF MARK S. ADAMS**
13 3031 W. March Lane, Suite 120
14 Stockton, California 95219

14 *Attorneys for Defendant Scientific Specialties, Inc.*

15 **[X] BY E-MAIL**

16 The above-referenced document was transmitted to the person(s) at the e-mail
17 addresses listed herein at their most recent known e-mail address or e-mail of record in
18 this action. I did not receive, within reasonable time after the transmission, any electronic
19 message or other indication that the transmission was unsuccessful.

19 State of California, Labor & Workforce Development Agency Web URL:
20 <http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

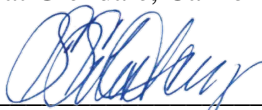
20 **[X] BY ONLINE SUBMISSION**

21 The foregoing documents were transmitted to the California Labor and Workforce
22 Development Agency through the online system established for the submission of notices
23 and documents, in conformity with California Labor Code section 2699(l). I did not
24 receive, within a reasonable time after the transmission, any electronic message or other
25 indication that the transmission was unsuccessful.

24 **[X] STATE**

25 I declare under penalty of perjury under the laws of the State of California that the above
26 is true and correct.

26 Executed on March 17, 2021, at Glendale, California.

27 
28 _____
Suzana Solis

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203