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Superior Court of California  
County of Riverside  
9/29/2020  
D. Brown  
Electronically Filed

Attorneys for Plaintiff CHARLES D. LADIMIR and all other similarly situated persons

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF RIVERSIDE**

CHARLES D. LADIMIR, on behalf of  
themselves and all others similarly situated,

Plaintiff,

V.

THE QUARRY AT LA QUINTA, INC., a California corporation; and, DOES 1 through 100, inclusive,

Defendants.

Case No. RIC1723794

Case Assigned For All Purposes to:  
*The Hon. Sunshine S. Sykes*  
 Dept.:6

## NOTICE OF ENTRY OF JUDGMENT AND ORDER GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Complaint Filed: December 19, 2017  
Trial Date: None Set

///

1           **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

2           PLEASE TAKE NOTICE that on August 7, 2020, the Honorable Sharon S. Waters in  
3 Department 6 of the Riverside County Superior Court granted final approval of the class action  
4 settlement in this action and issued Judgement. Attached hereto as **Exhibit A** is a true and correct  
5 copy of the Judgment. Attached hereto as **Exhibit B** is a true and correct copy of the Final  
6 Approval Order.

7  
8 September 29, 2020

**VERUM LAW GROUP, APC**

9  
10                               /s/ Sam Kim  
11                               Sam Kim  
12                               Yoonis Han  
13                               Attorneys for Plaintiff CHARLES D. LADIMIR,  
14                               and all other similarly situated persons  
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# EXHIBIT A

1 Sam Kim [SBN: 258467]  
2 Yoonis Han [SBN: 256151]  
3 **VERUM LAW GROUP, APC**  
4 841 Apollo Street, Suite 340  
5 El Segundo, CA 90245  
6 Telephone: (424) 320-2000  
7 Facsimile: (424) 221-5010  
8 [skim@verumlg.com](mailto:skim@verumlg.com)

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

AUG - 7 2020

S. Salazar *CSB*

Attorneys for Plaintiff CHARLES D. LADIMIR and all other similarly situated persons

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF RIVERSIDE**

CHARLES D. LADIMIR, on behalf of  
themselves and all others similarly situated,

Plaintiff,

v.

THE QUARRY AT LA QUINTA, INC., a  
California corporation; and, DOES 1  
through 100, inclusive,

Defendants.

Case No. RIC1723794

Case Assigned For All Purposes to:  
*The Hon. Sunshine S. Sykes*  
Dept.:6

**[PROPOSED] JUDGMENT**

Hearing Date: ~~May 7, 2020~~ *August 14, 2020*  
Time: 8:30 a.m.

Complaint Filed: December 19, 2017  
Trial Date: None Set

**[PROPOSED] JUDGMENT**

Pursuant to the Order Granting Motion for Final Approval of Class Action Settlement  
("Final Approval Order"), JUDGMENT IS HEREBY ENTERED AS FOLLOWS:

1. This Judgment incorporates by reference the definitions in the Joint Stipulation  
Re: Settlement of Class Action ("Settlement Agreement" or "Settlement") attached as Exhibit  
A to the Declaration of Sam Kim in Support of Final Approval of Class Action Settlement,

1 and all terms defined therein shall have the same meaning as set forth in the Settlement  
2 Agreement. Pursuant to Rule 3.769 (h) of the California Rules of Court, the Court hereby  
3 enters judgment consistent with and expressly set forth in the Settlement Agreement in the  
4 above-entitled case for Plaintiff Charles D. Ladimir and the Class Members who did not  
5 exclude themselves from the Settlement and who are identified in the class list that Defendant  
6 provided to the Settlement Administrator.

7 2. Class Counsel shall file a notice of entry of Order and Judgment, and provide  
8 the same to the Settlement Administrator, who shall post the Order and Judgment on the  
9 Settlement Administrator's website ([http://www.phoenixclassaction.com/class-action-](http://www.phoenixclassaction.com/class-action-lawsuits/judgments/)  
10 [lawsuits/judgments/](http://www.phoenixclassaction.com/class-action-lawsuits/judgments/)) within seven (7) calendar days after entry of Order and Judgment. The  
11 Settlement Administrator shall post a copy of this signed judgment for thirty (30) calendar  
12 days on its website in compliance with Rule 3.771(b) of the California Rules of Court in  
13 order to provide notice to the Class Members of this Judgment. The Settlement  
14 Administrator shall also provide a mailed copy of the notice of entry of Order and Judgment  
15 to Class Members.

16 3. The Notice of Entry of Judgment shall state the following:

17 **"TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**

18 PLEASE TAKE NOTICE that on <sup>AUG. 7, 2020</sup> ~~May 7, 2020~~, the Honorable <sup>SHARON J.</sup> ~~Sunshine S.~~  
19 <sup>WATERS</sup> ~~Sykes~~ in Department 6 of the Riverside County Superior Court granted final  
20 approval of the class action settlement in this action and issued Judgment.

21 Attached hereto as **Exhibit A** is a true and correct copy of the Judgment."

22 4. The Class Members bound this Judgment include "all current and former  
23 caddies who performed services for Defendant as a caddie at the Resort for the duration of a  
24 season or more at any time between December 19, 2013 through May 31, 2018" except for  
25 Class Member Alex Simcox, who submitted a timely and valid Request for Exclusion as  
26 provided in this Settlement Agreement ("Participating Settlement Class Members").

27 5. The scope of the release for the Participating Settlement Class Members is as  
28 follows: "the claims stated in the Complaint and those based on the facts alleged in the

1 Complaint from December 19, 2013 to May 2018” and the release by the Participating  
2 Settlement Class Members are effective on the Effective Date;

3 6. The Participating Settlement Class Members’ payments shall be made from the  
4 Net Settlement Amount according to the terms of the Settlement Agreement. The Net  
5 Settlement Amount is equal to the Gross Settlement Amount of \$100,000.00, minus the  
6 following payments:

- 7 a. \$6,500.00 as the Service Award shall be paid to the Class Representative,  
8 Charles D. Ladimir;
- 9 b. \$4,500.00 in settlement administrative fees and costs shall be paid to Phoenix  
10 Settlement Administrators;
- 11 c. \$33,333.33 in attorney’s fees shall be paid to Verum Law Group, APC (“Class  
12 Counsel”); and
- 13 d. \$6,000.00 in costs shall be paid to Class Counsel.

14 7. Defendant shall also separately reimburse Class Counsel for the portion of the  
15 mediation fees paid by Plaintiff in the amount of \$5,572.33. This amount shall not be deducted  
16 from the Gross Settlement Amount.

17 8. Pursuant to California Code of Civil Procedure Section 664.6 and Rule  
18 3.769(h) of the California Rules of Court, this Court reserves exclusive and continuing  
19 jurisdiction over this action, the Class Representative, members of the Class, and Defendant  
20 for the purposes of: (a) supervising the implementation, enforcement, construction, and  
21 interpretation of the Settlement Agreement, the Final Approval Order, and this Judgment; and  
22 (b) supervising distribution of amounts paid under this settlement.

23 9. Pursuant to Code of Civil Procedure section 384(b), the Settlement  
24 Administrator shall submit a declaration concerning the total amount that was actually paid to  
25 Settlement Class Members, and to be filed by Class Counsel by March 10, 2021, which  
26 shall contain the following information: (i) the date the checks were mailed; (ii) the total  
27 number of checks mailed to Settlement Class Members; (iii) the average amount of those  
28 checks; (iv) the number of checks that remain uncashed; (v) the total value of those uncashed

1 checks; (vi) the average amount of the uncashed checks; (vii) the nature and date of the  
2 disposition of those unclaimed funds. The declaration by the Settlement Administrator shall  
3 be accompanied by a proposed amended judgment that complies with Code of Civil  
4 Procedure section 384.5.

5 10. In the event the settlement checks to Settlement Class Members remain un-  
6 cashed after one hundred twenty (120) days from issuance, the Settlement Administrator shall  
7 forward the un-cashed funds, plus any accrued interest that has not been distributed pursuant  
8 to the order of the Court, to the cy pres designation, the Wage Justice Center.

9  
10 DATED: Aug 7, 2020



*The Hon. Sunshine S. Sykes*  
Judge of the Superior Court

# EXHIBIT B



5/7/2020

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

AUG - 7 2020

**S. Salazar**

Sam Kim [SBN: 258467]  
Yoonis Han [SBN: 256151]  
**VERUM LAW GROUP, APC**  
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[skim@verumlg.com](mailto:skim@verumlg.com)

Attorneys for Plaintiff CHARLES D. LADIMIR and all other similarly situated persons

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF RIVERSIDE**

CHARLES D. LADIMIR, on behalf of  
themselves and all others similarly situated,

Plaintiff,

v.

THE QUARRY AT LA QUINTA, INC., a  
California corporation; and, DOES 1  
through 100, inclusive,

Defendants.

Case No. RIC1723794

Case Assigned For All Purposes to:  
*The Hon. Sunshine S. Sykes*  
Dept.:6

**~~PROPOSED~~ ORDER**

Hearing Date: ~~May 7, 2020~~ August 4, 2020  
Time: 8:30 a.m.

Complaint Filed: December 19, 2017  
Trial Date: None Set

**~~PROPOSED~~ ORDER**

This matter came before the Court on May 7, 2020 for a hearing on the Motion for Final Approval of Class Action Settlement. Due and adequate notice having been given to Class Members as required by the Court's Preliminary Approval Order, and the Court having considered all papers filed and proceedings herein, and good cause appearing therefore, it is hereby ORDERED AS FOLLOWS:

1           1.     This Order incorporates by reference the definitions in the Joint Stipulation Re:  
2 Settlement of Class Action ("Settlement Agreement" or "Settlement") attached as Exhibit A to  
3 the Declaration of Sam Kim in Support of Final Approval of Class Action Settlement and all  
4 terms defined therein shall have the same meaning as set forth in the Settlement Agreement.

5           2.     The Court has jurisdiction over the subject matter of the Action and over all  
6 Parties to the Action, including Class Members.

7           3.     The Court finds the Settlement Agreement attached as Exhibit A to the  
8 Declaration of Sam Kim in Support of Final Approval of Class action Settlement referenced  
9 above, was entered into in good faith, that the settlement is fair, reasonable and adequate, and  
10 that the settlement satisfies the standards and applicable requirements for final approval of this  
11 class action settlement under California law, including the provisions of California Code of  
12 Civil Procedure section 382 and California Rules of Court, Rule 3.769.

13          4.     The Court finds that the Class Notice provided to the Class Members pursuant  
14 to the Settlement Agreement and Preliminary Approval Order fully satisfies the requirements  
15 of due process, constitutes the best notice practicable under the circumstances, by providing  
16 individual notice to all Class Members who could be identified through reasonable effort, and  
17 by providing due and adequate notice of the proceedings and of the matters set forth therein to  
18 the other Class Members.

19          5.     The Court finds that in response to the Class Notice, no Class Members objected  
20 to the Settlement and one timely and valid Request for Exclusion was received from Class  
21 Member Alex Simcox.

22          6.     The Court finds that the Settlement Agreement was reached as a result of  
23 informed and non-collusive arm's-length negotiations. The Court further finds that the Parties  
24 conducted sufficient investigation, research, and discovery and that their attorneys were able  
25 to reasonably evaluate their respective positions. The Court also finds that Settlement will  
26 enable the Parties to avoid additional and potentially substantial litigation costs, as well as  
27 delay and risks if the Parties were to continue to litigate the case. The Court has reviewed the  
28 monetary recovery provided as part of the Settlement Agreement and recognizes the significant

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24 conducted sufficient investigation, research, and discovery and that their attorneys were able  
25 to reasonably evaluate their respective positions. The Court also finds that Settlement will  
26 enable the Parties to avoid additional and potentially substantial litigation costs, as well as  
27 delay and risks if the Parties were to continue to litigate the case. The Court has reviewed the  
28 monetary recovery provided as part of the Settlement Agreement and recognizes the significant

value accorded to the Class.

7. The Court hereby confirms Sam Kim and Yoonis Han of Verum Law Group, APC as Class Counsel in the Action. The Court hereby confirms Charles D. Ladimir as the Class Representative in the Action.

8. Pursuant to the terms of the Settlement Agreement, and the authorities, evidence and argument submitted by Class Counsel, the Court hereby awards Class Counsel attorneys' fees in the sum of \$33,333.33, litigation costs in the sum of \$6,000.00, and mediation fees paid in the amount of \$5,572.33 and complete satisfaction of any and all attorneys' fees and costs incurred by and/or owed to Class Counsel and any other person or entity related to the above-captioned action. The Court further orders that the award of attorneys' fees and costs set forth in this Paragraph shall be administered pursuant to the terms of the Settlement Agreement.

9. In addition to any recovery that Plaintiff may receive under the Settlement Agreement, and in recognition of the Plaintiff's efforts on behalf of the Participating Settlement Class, the Court hereby approves and orders the Class Representative Service Award to Charles D. Ladimir in the amount of \$6,500.00.

10. The Court also hereby approves and orders the payment to Phoenix Settlement Administrators for its settlement administration services in the amount of \$4,500.00.

11. Class Counsel shall file a notice of entry of Order and Judgment, and provide the same to the Settlement Administrator, who shall post the Order and Judgment on the Settlement Administrator's website (<http://www.phoenixclassaction.com/class-action-lawsuits/judgments/>) within seven (7) calendar days after entry of Order and Judgment. The Settlement Administrator shall post a copy of this signed order for 180 days after the Individual Settlement Payments are mailed to the Settlement Class Members. The Settlement Administrator shall also provide a mailed copy of the notice of entry of Order and Judgment to Class Members.


12. The Parties shall bear their own costs and attorneys' fees except as otherwise provided for by the Settlement Agreement and the Court's Order granting award of attorneys'

1 fees, litigation costs, Class Representative Service Award, Settlement Administration Costs,  
2 and reimbursement for mediation fees paid by Class Counsel.

3 13. Without affecting the finality of this Order in any way, the Court retains  
4 jurisdiction of all matters relating to the interpretation, administration, implementation,  
5 effectuation and enforcement of this order and the Settlement.

6 14. Pursuant to CRC 3.771, the Final Approval Order and Judgment in this action  
7 shall be binding on the Class Representative, and all Participating Class Members, except Class  
8 Member Alex Simcox, who submitted a timely and valid Request for Exclusion as provided in  
9 the Settlement Agreement.

10  
11 DATED: Aug. 4, 2020

  
The Hon. Sunshine S. Sykes  
Judge of the Superior Court

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9 the Settlement Agreement.  
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11 DATED: Aug. 4, 2000



The Hon. Sunshine S. Sykes  
Judge of the Superior Court

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