

**FILED**  
Superior Court of California  
County of Los Angeles

04/12/2023

David W. Slayton, Executive Officer / Clerk of Court

By: A. Rosas Deputy

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Attorneys for Plaintiff Shaheed Richardson,  
individually, and on behalf of all other similarly situated employees

**SUPERIOR COURT OF STATE OF CALIFORNIA  
FOR THE COUNTY LOS ANGELES – SPRING STREET COURTHOUSE**

SHAHEED RICHARDSON, as an individual  
and on behalf of other similarly situated  
employees,

Plaintiff,

vs.

INTERSTATE HOTELS, LLC a California  
corporation, and DOES 1-50, inclusive,

Defendants.

CASE NO.:22STCV04750

Assigned for all purposes to:  
Hon. Stuart M. Rice  
Dept. 1

**~~PROPOSED~~ ORDER GRANTING  
PLAINTIFF RICHARDSON'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: April 7, 2023  
Time: 10:30 a.m.  
Place: Department 1

Case filed: February 7, 2022  
Trial date: TBD

**~~PROPOSED~~ ORDER GRANTING PLAINTIFF RICHARDSON'S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

1 THIS MATTER having been brought before the Court on behalf of Plaintiff Shaheed  
2 Richardson (referred to herein as “Plaintiff”), through his attorneys, pursuant to California Rule  
3 of Court 3.769 and other applicable rules and laws, to request an order granting preliminary  
4 approval of a class action settlement and directing the dissemination of notice to the class (the  
5 “Order”); the Court having reviewed the Plaintiff’s submissions, having held a hearing on April  
6 7, 2023, and having found that Plaintiff is entitled to the relief sought, and for good cause shown:

7 IT IS HEREBY ORDERED that Plaintiff’s motion is GRANTED, and it is further  
8 ORDERED as follows:

9 1. This proposed fully executed Stipulation of Class Action Settlement (“Settlement  
10 Agreement” or “Agreement”), submitted with the motion and filed with the Court, is  
11 preliminarily approved as being within the range of potential final approval.<sup>1</sup>

12 2. Based upon the submission to the Court and attachments and exhibits thereto, the  
13 Court conditionally makes the following findings solely for settlement purposes only, subject to  
14 final approval at the Final Approval Hearing:

- 15 a. The Class Members are so numerous as to make joinder impracticable;  
16 b. There are questions of law and fact common to the Class Members, and such  
17 questions predominate over any questions affecting only individual Class  
18 Members;  
19 c. Named Plaintiff’s claims and the defenses thereto are typical of the claims of  
20 the Class Members and the defenses thereto;  
21 d. Named Plaintiff and Class Counsel can protect and have fairly and adequately  
22 protected the interest of the Class members in the lawsuit; and  
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27 <sup>1</sup> Unless otherwise specified, all defined terms in this Order have the same meaning as the meaning described in the Settlement  
28 Agreement, and those terms are incorporated here by this reference. To the extent there is any conflict between the definitions of those terms, the  
definitions in the Settlement Agreement will control.

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e. A class action is superior to all other available methods for fairly and efficiently resolving the claims in connection to this lawsuit and provides substantial benefits to the Class Members.

3. Accordingly, solely for purposes of this settlement only, the Court preliminarily approves the Named Plaintiff as representative of the Class Members, and conditionally certifies a settlement class defined as follows:

All 49 current and former non-exempt security guard workers at Defendant's facilities during the relevant class period from February 7, 2018 through December 31, 2022.

4. This matter is conditionally certified as a class action for settlement purposes only under California Code of Civil Procedure Section 382 and California Rules of Court, Chapter 6, Rules 3.767 *et seq.*, and/or other laws as applicable. If the settlement does not receive final approval, Defendants retain the right to assert that this action may not be certified as a class action for liability purposes.

5. Solely for purposes of implementing the Settlement Agreement and for purposes of this settlement, the Court preliminarily appoints as Class Counsel Jackson APC.

6. The Court finds that the Settlement Agreement falls within the range of possible approval such that it warrants notice thereto and further orders notice of the settlement to be disseminated to the Class Members in the manner set forth herein and in the Settlement Agreement.

7. A final hearing (the "Final Approval Hearing") shall be held before this Court on U&G at AFCCG-Hofekia to determine whether: (a) the Court should finally approve the Settlement Agreement and determine that the terms contained therein are fair, reasonable, adequate, and in the best interests of the Class Members, (b) the Court should enter final judgment dismissing with prejudice the operative Complaint in this lawsuit, (c) to approve the

1 application for the Attorneys' Fee Award to Class Counsel and Named Plaintiffs' Incentive  
2 Awards in a manner consistent with the Settlement Agreement. The Final Approval Hearing may  
3 be postponed, adjourned or continued by further order of this Court, without further notice to the  
4 Class Members.

5 8. At the Final Approval Hearing, the Court will consider and determine whether the  
6 Settlement Agreement should be finally approved as fair, adequate and reasonable in light of any  
7 timely valid objections presented by the Class Members and the parties' responses to any such  
8 objections that have been submitted to the Court in accordance with the provisions set forth  
9 below.

10 9. The Court hereby approves the appointment of Phoenix ("Claims  
11 Administrator") as the Claims Administrator for the purposes of disseminating the Class Notice  
12 and Exclusion Form attached to the settlement agreement, which are hereby approved, and for  
13 purposes of administering the terms of the settlement as set forth in the Settlement Agreement.  
14 The Claims Administrator shall perform its duties consistent with the provisions contained  
15 within the Settlement Agreement.

16 10. Any Class Member may object to the fairness, reasonableness or adequacy of the  
17 proposed settlement. To assert a valid and timely objection to the Settlement, a Class Member  
18 may file an objection with the Court either in writing or at the time of the hearing or appear at the  
19 hearing an object at that time.

20 11. The Court finds that the manner of dissemination and content of the Class Notice  
21 specified in detail in the Settlement Agreement (i) is the best notice practicable, (ii) is reasonably  
22 calculated, under the circumstances, to apprise Class Members of the pendency of the lawsuit  
23 and of their right to object to or to exclude themselves from the proposed settlement, (iii) is  
24 reasonable and constitutes due, adequate and sufficient notice to all persons entitled to receive  
25 notice, and (iv) meets all applicable requirements of applicable law.

26 12. Class Counsel shall file and serve papers in support of final approval of the  
27  
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1 Settlement no later than sixteen (16) court days in advance of the Final Approval Hearing.

2 13. The Claims Administrator is hereby ordered no later than (16) court days before the  
3 Final Approval Hearing to file an affidavit attesting completeness and accuracy of the proof of  
4 mailing of the Class Notice and Exclusion Form to the Class Members.

5  
6 Dated: ~~11/13/11~~ ~~11/13/11~~

JUDGE OF THE SUPERIOR COURT



*Stuart M. Rice*

By: Stuart M. Rice / Judge  
The Honorable Judge Stuart M. Rice

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**[PROPOSED] ORDER GRANTING PLAINTIFF RICHARDSON'S MOTION FOR  
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