

Electronically Received 06/15/2023 10:47 AM

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FILED
Superior Court of California
County of Los Angeles
FILED
06/16/2023
Superior Court of California
County of Los Angeles
David W. Slayton, Executive Officer / Clerk of Court
By: A. Rosas 06/16/2023
Deputy
David W. Slayton, Executive Officer / Clerk of Court
By: A. Rosas Deputy

5 Attorneys for Plaintiff FERNANDO PEREYRA, and on behalf of himself and all other similarly
6 situated,

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF LOS ANGELES**

9 FERNANDO PEREYRA, as an individual and
10 on behalf of all employees similarly situated,

11 Plaintiff,

12 v.

13 MAVERICK AEROSPACE, LLC, and DOES
14 1-50, inclusive,

15 Defendant.

CASE NO.: 20STCV29642

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AMENDED [PROPOSED] ORDER
GRANTING FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
AWARDING ATTORNEY'S FEES,
COSTS AND ENHANCEMENT AWARD

Assigned for all purposes to:
Honorable Elihu Berle Dept. 6

Complaint Filed: August 4, 2020
Trial Date: None Yet Set

1 **[PROPOSED] ORDER**

2 The Court, having read and considered the papers filed in support of the motion, the
3 proposed class notice and other documents, having considered the arguments of counsel, and good
4 cause appearing therefore,

5 **IT IS HEREBY ORDERED:**

6 1. The Parties’ Joint Stipulation of Class Action Settlement and Release of Claims
7 (the “Settlement Agreement”) entered into by and between Plaintiff Fernando Pereyra Plaintiff”)
8 and Defendant Maverick Aerospace, LLC; (“Defendant”), attached hereto as Exhibit A, is finally
9 approved as the terms of the Settlement Agreement fall within the range of approval as fair,
10 adequate and reasonable.

11 2. The Settlement Class consists of the following: all current or former non-exempt
12 hourly-paid employees, who worked for Defendant in California at any time during the period
13 from August 4, 2016, through March 6, 2022 (the “Class Period.”). The total number of
14 participating Class Members consists of Two Hundred (200) individuals, including Plaintiff.

15 3. The PAGA Group consists of all current or former non-exempt hourly-paid
16 employees who worked for Defendant in California at any time during the period from May 16,
17 2019, through March 6, 2022 (the “PAGA Period”).

18 4. The proposed Class satisfies the requirements of a class because the members of
19 the Class are readily ascertainable, and a well-defined community of interest exists in the
20 questions of law and fact affecting the Parties.

21 5. Plaintiff Fernando Pereyra is appointed as Class Representative. Justin Lo of Work
22 Lawyers PC is appointed as Class Counsel.

23 6. Phoenix Settlement Administrator is appointed to act as the Settlement
24 Administrator, pursuant to the terms set forth in the Settlement Agreement. The Settlement
25 Administrator is ordered to carry out the Settlement distribution according to the terms of the
26 Settlement Agreement and in conformity with this Order.

27 7. The Court awards attorney’s fees to Class Counsel, Work Lawyers, PC, in the
28 amount of Ninety-Eight Thousand, Three Hundred and Thirty-Three Dollars and Thirty-Three
Cents (\$98,333.33). The Court finds the attorney’s fee is justified in light of the efficiency and

1 quality of the settlement in the face of substantial risks, the relative early procurement of benefits
2 to the class and the contingency nature of the representation in this matter. The Court further
3 finds the hourly rates assigned by Class Counsel to be reasonable in light of the experience of
4 counsel.

5 8. The Court awards costs of litigation in the amount of Thirteen Thousand, Seven
6 Hundred and Sixty-One Dollars and Zero Cents (\$13,761.00) to Work Lawyers PC.

7 9. The Court awards the administration costs in the amount of Seven Thousand,
8 Seven Hundred and Fifty Dollars and Zero Cents (\$7,750.00) payable to Phoenix Settlement
9 Administrators.

10 10. The Court hereby awards Class Representative Fernando Pereyra an Enhancement
11 Payment of Five Thousand Dollars and Zero Cents (\$5,000.00). The Court finds Plaintiff has
12 undertaken significant risk and performed valuable services on behalf of the Settlement Class and
13 that this award would have a negligible impact on the claims of any of the Settlement Class
14 Members.

15 10. The Court hereby approves the allocation of Ten Thousand Dollars and Zero Cents
16 (\$10,000.00) for the PAGA claims, of which Seven Thousand, Five Hundred Dollars and Zero
17 Cents (\$7,500.00) will be paid to the California Labor and Workforce Development Agency
18 (“LWDA”) and the remaining Two Thousand, Five Hundred Dollars and Zero Cents (\$2,500.00)
19 will be distributed to the PAGA Group pursuant to the Settlement Agreement.

20 11. The Court orders a Final Distribution Report from the Settlement Administrator to
21 be filed by January 29, 2024. An order to show cause RE: compliance regarding the filing of the
22 Final Distribution Report from the Settlement Administrator is set for February 9, 2024 at
23 8:30AM.

24 12. Accordingly, the Court orders all Parties and their counsel to cooperate in fulfilling
25 the terms of the Settlement Agreement herein consistent with this order, and this Court shall retain
26 jurisdiction to effectuate the terms of the settlement including the binding effect of the releases
27 set forth in the Settlement Agreement as to both the class representative and the participating
28 putative class members herein.

