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12 LARINE SHIELDS, and TAYLOR EVANS

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

15 ADRIANA HAYTER, LARINE SHIELDS,
16 and TAYLOR EVANS; individually, and on
17 behalf of all other similarly situated persons;
18 and ROES 1-100,

19 Plaintiffs,

20 v.

21 EWALD & WASSERMAN RESEARCH
22 CONSULTANTS, LLC, a California limited
23 liability corporation; KATRIN EWALD, an
24 individual; LISA WASSERMAN, an
25 individual; and DOES 1-20,

26 Defendants.

Case No. CGC-19-577753

**[PROPOSED] ORDER GRANTING
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: November 10, 2021

Time: 9:15 a.m.

Dept.: 304

Judge: Hon. Anne-Christine Massullo

1 The Court has before it Plaintiffs' unopposed Motion for Final Approval of Class Action
2 Settlement. After reviewing Plaintiffs' Motion for Final Approval and the supporting documents,
3 the parties' settlement agreement in this matter (the "Settlement Agreement"), and other papers
4 filed herein, and after conducting a hearing on Plaintiffs' Motion, the Court hereby finds and
5 orders as follows:

6 1. For the purposes of this Order, the Court adopts all defined terms as set forth in
7 the Settlement Agreement previously filed with this Court.

8 2. This Court has jurisdiction over the subject matter of this litigation and over all
9 parties and Class Members in this litigation.

10 3. Pursuant to this Court's Preliminary Approval Order, the Settlement Administrator
11 completed the distribution of the Class Notice to the Class as previously approved by the Court.
12 The Class Notice informed the Class Members of the Settlement terms, their rights to object or
13 opt-out of the Settlement, their rights to dispute the number of Work Weeks according to
14 Defendants' business records, and their rights to appear in person or by counsel at the Final
15 Approval Hearing and be heard regarding approval of the Settlement.

16 4. Adequate periods of time to respond and to act were provided by each of these
17 procedures.

18 5. The Court finds that the distribution of the Notice, which was carried out pursuant
19 to the Settlement Agreement, constituted the best notice practicable under the circumstances and
20 fully met the requirements of due process.

21 6. The Court finds that the class definitions are properly set forth in the Settlement
22 Agreement and that those definitions are sufficient for the purpose of California Rule of Court
23 3.765(a).

24 7. The Court finds that no Class Members have objected or opted out of the
25 Settlement.

26 8. The Court finds that the Settlement Agreement was the product of arm's length
27 negotiations between experienced counsel. After considering Defendants' potential exposure, the
28 likelihood of success on the class claims, the risk, expense, complexity and delay associated with
further litigation, the risk of maintaining class certification through trial, the experience and views
of Plaintiffs' Counsel, and the reaction of the Class to the Settlement, as well as other relevant
factors, the Court finds that the Settlement, as set forth in the Settlement Agreement, is fair,

1 reasonable, and in the best interests of the Class, and hereby grants final approval of the
2 Settlement. The parties are ordered to carry out the Settlement as provided in the Settlement
3 Agreement.

4 9. The Court also finds that the \$4,300 designated for Simpluris, Inc. as the
5 Settlement Administrator is fair and reasonable. The Court grants final approval of, and orders
6 the payment to Simpluris to be made in accordance with the Settlement Agreement.

7 10. A Compliance Hearing is scheduled for _____, 2022 and the
8 compliance status report must be filed and served on Department 304 at least five (5) court days
9 prior to the Compliance Hearing.

10 IT IS SO ORDERED.

11 Dated: _____, 2021

12 _____
13 HONORABLE CHRISTINE-ANNE MASSULLO
14 JUDGE OF THE SUPERIOR COURT
15 OF THE STATE OF CALIFORNIA,
16 COUNTY OF SAN FRANCISCO