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ORIGINAL FILED
Superior Court of California
County of Los Angeles

NOV 01 2013

Sherri R. Carter, Executive Officer/Clerk
By: Martha Cervantes, Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MICHAEL J. HOLLAND, DAVID
RICHARDSON and GERALDINE EVANS,
on behalf of themselves and others similarly
situated, and on behalf of the general public,

Plaintiffs,

vs.

SECURITAS SECURITY SERVICES USA,
INC., a Delaware Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: BC 394 708

CASE FILED: 07/18/08

CLASS ACTION

**[PROPOSED] FINAL JUDGMENT
APPROVING CLASS ACTION
SETTLEMENT**

Date: November 1, 2013
Time: 9:00 a.m.
Dept: 308

1 Plaintiffs' motion for final approval of class action settlement came on for hearing before
2 this Court on November 1, 2013.

3 By Order dated November 1, 2013, the Court granted Plaintiffs' Motion for Final
4 Approval of Class Action Settlement ("Final Approval Order"). After considering all the
5 arguments and submissions for and against final approval of the proposed settlement and the
6 Court being fully advised, IT IS HERBY ORDERED, ADJUDGED AND DECREED AS
7 FOLLOWS:

8 1. Pursuant to the Court's Final Approval Order, the Court adopted the
9 defined terms set forth in the Joint Stipulation of Settlement and Release between Plaintiffs and
10 Defendant ("Stipulation of Settlement" or "Settlement").

11 2. The Court found and determined that the proposed Class meets all of the
12 legal requirements for class certification, and confirmed its Order of June 14, 2012, wherein the
13 Court certified the Class consisting of all non-union security guards formerly employed by
14 Defendant in California who were required to wear a "soft look" uniform during the period of
15 July 18, 2004 through January 31, 2010, and only for claims for compensation of the expense of
16 dry cleaning the uniform.

17 3. The Court found and determined that the distribution of the Notice and the
18 Claim Form directed to the Class Members as set forth in the Stipulation of Settlement has been
19 completed in conformity with the Order Granting Preliminary Approval of Class Action
20 Settlement, filed July 29, 2013 ("Preliminary Approval Order"), including individual notice to all
21 Class Members who could be identified through reasonable effort, and as otherwise set forth in
22 the Stipulation of Settlement. The Notice provided due and adequate notice of the proceedings,
23 including the material elements of the proposed Settlement, to all persons entitled to such Notice,
24 and the Notice fully satisfied the requirements of due process.

25 4. The Court found that there were no objections to the Settlement filed prior
26 to the hearing or raised by any person at the final approval hearing. Sixteen (16) members of the
27 Class requested to be excluded.

28 5. The Court found that the Settlement was entered into in good faith. The

1 Court further found that Plaintiffs have satisfied the standards and applicable requirements for
2 final approval of this class action settlement.

3 6. The Court found that the terms of the Stipulation of Settlement were
4 obtained after discovery, investigation, analysis and research by qualified and experienced
5 counsel, and was the product of extensive and arm's length bargaining and efforts. Counsel for
6 both Parties reasonably evaluated their respective positions.

7 7. The Court found and determined that the terms of the Stipulation of
8 Settlement and settlement set forth herein are fair, adequate and reasonable to the Settlement
9 Class; that all members of the Settlement Class will be bound by the Settlement; that the
10 settlement set forth in the Stipulation of Settlement is finally approved; and that all terms and
11 provisions of the Settlement Agreement are hereby effectuated.

12 8. The Court acknowledged the Parties' representation that the claims being
13 released by the class members (other than the class representatives) pursuant to this Stipulation of
14 Settlement do not include any claims for wages or any claims under Labor Code section 203.

15 9. The Court found that each and every Class Member is and shall be deemed
16 to have conclusively released the Released Claims as against the Released Parties. Each and
17 every Class Member who has not submitted a valid Request for Exclusion hereby releases and is
18 forever barred and enjoined from instituting or prosecuting the Released Claims, except as to such
19 rights or claims as may be created by the Settlement, against the Released Parties during the Class
20 Period. In addition, each Class Member who has not submitted a valid Request for Exclusion is
21 forever barred and enjoined from instituting or accepting damages or obtaining relief against the
22 Released Parties for Released Claims.

23 10. The Court found the settlement payments provided for under the
24 Settlement to be fair and reasonable in light of all the circumstances. The Court ordered the
25 calculations and the payments to be made and administered in accordance with the terms of the
26 Settlement.

27 11. The Court confirmed Westrup Klick, LLP, Magnanimo & Dean, LLP,
28 Tostrud Law Group, P.C., Stephan Zouras, LLP, and Cuneo Gilbert & Laduca, LLP as Class

1 Counsel in the Action.

2 12. The Court awarded Class Counsel attorneys' fees in the amount of
3 \$800,000, and reasonably incurred attorney costs in the amount of \$180,000, to be deducted and
4 paid from the Maximum Settlement Amount, as final payment for and complete satisfaction of
5 any and all attorneys' fees and costs incurred by and/or owed to Class Counsel and any other
6 person or entity related to the Action. The Court found that under the lodestar analysis and the
7 percentage-of-the-benefit approach this is a fair and reasonable amount of attorneys' fees. The
8 Court further ordered that the award of attorneys' fees and costs will be administered pursuant to
9 the terms of the Stipulation of Settlement, and transferred and/or made payable to Class Counsel
10 in the Action.

11 13. The Court approved and ordered Enhancement Awards to Class
12 Representatives Michael Holland, David Richardson and Geraldine Evans in the amount of
13 \$5,000 each and payment of \$10,000 each for release of their individual claims above and beyond
14 class claims, all to be paid from the Maximum Settlement Amount as set forth in the Stipulation
15 of Settlement. The Court finds that such awards are fair and reasonable in light of the time and
16 effort expended and the risk assumed by them in prosecuting this action.

17 14. The Court approved and ordered the payment of \$5,000 to the Labor
18 Workforce Development Agency to be paid from the Maximum Settlement Amount as set forth
19 in the Stipulation of Settlement

20 15. The Court confirmed the appointment of Simpluris, Inc. as Claims
21 Administrator. The Court approves and orders the payment from the Class Settlement Amount
22 for claims administration expenses incurred by the Claims Administrator in the amount of
23 \$58,000, to be paid from the Maximum Settlement Amount as set forth in the Stipulation of
24 Settlement.

25 16. The Court also ordered, provided the Settlement becomes effective under
26 the terms of the Stipulation of Settlement, the deadline for mailing the Court-approved settlement
27 awards, and the attorneys' fees and costs, and service and individual payments are to be made, as
28 set forth in the Settlement.

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17. The Court hereby enters judgment of the entire Action, with prejudice, pursuant to the terms set forth in the Stipulation of Settlement. Without affecting the finality of this judgment, the Court hereby retains continuing jurisdiction over the interpretation, implementation and enforcement of the Settlement, and the Settlement Agreement and all orders entered in connection therewith.

Dated: 11-1-13

JANE L. JOHNSON

Honorable Jane Johnson
Judge of the Superior Court