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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  
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 ORDER  
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. Having considered the papers filed in support of this motion,  
3 the papers filed in support of the motion for preliminary approval of class action settlement, the  
4 arguments of counsel, and good cause appearing therefore, the Court finds and orders as follows:

5 1. For purposes of this Order, the Court adopts the defined terms set forth in  
6 the Joint Stipulation of Settlement and Release between Plaintiffs and Defendant ("Stipulation of  
7 Settlement" or "Settlement").

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

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

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

25 5. The Court finds that the Settlement was entered into in good faith. The  
26 Court further finds that Plaintiffs have satisfied the standards and applicable requirements for  
27 final approval of this class action settlement.

28 6. The Court finds that the terms of the Stipulation of Settlement were

1 obtained after discovery, investigation, analysis and research by qualified and experienced  
2 counsel, and are the product of extensive and arm's length bargaining and efforts. Counsel for  
3 both Parties reasonably evaluated their respective positions.

4           7. The Court finds and determines that the terms of the Stipulation of  
5 Settlement and settlement set forth herein are fair, adequate and reasonable to the Settlement  
6 Class; that all members of the Settlement Class will be bound by the Settlement; that the  
7 settlement set forth in the Stipulation of Settlement is finally approved; and that all terms and  
8 provisions of the Settlement Agreement are hereby effectuated.

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

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

20           10. The Court finds the settlement payments provided for under the Settlement  
21 to be fair and reasonable in light of all the circumstances. The Court orders the calculations and  
22 the payments to be made and administered in accordance with the terms of the Settlement.

23           11. The Court confirms Westrup Klick, LLP, Magnanimo & Dean, LLP,  
24 Tostrud Law Group, P.C., Stephan Zouras, LLP, and Cuneo Gilbert & Laduca, LLP as Class  
25 Counsel in the Action.

26           12. Pursuant to the terms of the Settlement, and the authorities, evidence and  
27 argument submitted by Class Counsel, the Court awards Class Counsel attorneys' fees in the  
28 amount of \$800,000, and reasonably incurred attorney costs in the amount of \$180,000, to be

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

8  
9 13. The Court approves and orders Enhancement Awards to Class  
10 Representatives Michael Holland, David Richardson and Geraldine Evans in the amount of  
11 \$5,000 each and payment of \$10,000 each for release of their individual claims above and beyond  
12 class claims, all to be paid from the Maximum Settlement Amount as set forth in the Stipulation  
13 of Settlement. The Court finds that such awards are fair and reasonable in light of the time and  
14 effort expended and the risk assumed by them in prosecuting this action.

15 14. The Court approves and orders the payment of \$5,000 to the Labor  
16 Workforce Development Agency to be paid from the Maximum Settlement Amount as set forth  
17 in the Stipulation of Settlement

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

23 16. Provided the Settlement becomes effective under the terms of the  
24 Stipulation of Settlement, the Court orders that the deadline for mailing the Court-approved  
25 settlement awards, and the attorneys' fees and costs, and service and individual payments, are to  
26 be made as set forth in the Settlement.

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17. The Court will enter a Judgment of the entire Action, with prejudice, pursuant to the terms set forth in the Stipulation of Settlement. Without affecting the finality of this Order and judgment to be entered herein, the Court retains continuing jurisdiction over the interpretation, implementation and enforcement of the Settlement, and the Settlement Agreement and all orders entered in therewith.

**IT IS SO ORDERED.**

Dated: 11-1-13

**JANE L. JOHNSON**

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Honorable Jane Johnson  
Judge of the Superior Court