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LYRIK M. KOOTTUNGAL

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

LYRIK M. KOOTTUNGAL, individually  
and on behalf of others similarly situated, and  
as an aggrieved employee and Private  
Attorney General;

Plaintiff,

vs.

TEAM TOURS, LLC, an Arizona limited  
liability company; THE TEAM  
COMPANIES, LLC, a Delaware limited  
liability company, ROC NATION  
MANAGEMENT, LLC, a Delaware Limited  
Liability Company, ROC NATION LLC, a  
Delaware Limited Liability Company; ROC  
NATION PUBLISHING, LLC, a Delaware  
Limited Liability Company. ROC NATION  
SPORTS, LLC, a Delaware limited liability  
company, ROC NATION ADVERTISING  
LLC, a Delaware limited liability company,  
BACKLIT BUHR MEDIA LLC, a California  
Limited Liability Company, DIVERSIFIED  
PRODUCTION SERVICES, LLC, a  
Delaware Limited Liability Company,  
DIVERSIFIED PRODUCTION SERVICES,  
INC. a California Corporation, DOES 9  
through 50, inclusive;

Defendants.

Case No.: 22STCV33134

*Assigned for all purposes to the Hon. Stuart  
M. Rice, Dept. 1*

**AMENDED ~~PROPOSED~~ ORDER  
GRANTING MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: April 18, 2025  
Time: 10:30 a.m.  
Dept.: 1

Complaint Filed: October 10, 2022  
FAC Filed: February 8, 2023  
SAC Filed: May 11, 2023  
Trial Date: None Set

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

04/18/2025

David W. Stryker, Executive Officer / Clerk of Court

By:                      A. He                      Deputy

**~~PROPOSED~~ ORDER**

The Motion of Plaintiff Lyrik M. Koottungal (“Plaintiff”) for Preliminary Approval of Class Action and PAGA Settlement (“Motion”) came on regularly for hearing before this Court on April 18, 2025. The Court, having considered the proposed Class Action Settlement Agreement (“Settlement Agreement” or “Settlement”), attached as **Exhibit 1** to the Declaration of Heather M. Davis and **Exhibit A** to this [Proposed] Order filed concurrently with the Motion, having considered Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement, memorandum of points and authorities in support thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

1. The Court GRANTS preliminary approval of the class action settlement as set forth in the Settlement Agreement and finds its terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by the Court at a Final Fairness hearing. All terms used herein shall have the same meaning as defined in the Settlement Agreement. For purposes of the Settlement only, the Court finds that the proposed Class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following settlement Class:

All current and former non-exempt employees of Defendants who worked at the 2022 Superbowl at SoFi Stadium at any time from October 10, 2021 through October 22, 2024.

2. For purposes of the Settlement only, the Court designates Plaintiff as Class Representative, and designates Protection Law Group, LLP as Class Counsel.

3. The Court designates Apex Class Action Settlement Administrators as the third-party Settlement Administrator.

4. The parties are ordered to implement the Settlement according to the terms of the Settlement Agreement.

5. The Court approves, as to form and content, the proposed Notice of Proposed Class Action Settlement and Final Approval Hearing (“Notice of Settlement”) attached as **Exhibit A** to Settlement Agreement.

1           6.       The Court finds that the form of notice to the Class regarding the pendency of the  
2 action and of the Settlement, the dates selected for mailing and distribution, and the methods of  
3 giving notice to members of the Class, satisfy the requirements of due process, constitute the best  
4 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all  
5 members of the Class. The form and method of giving notice complies fully with the requirements  
6 of California Code of Civil Procedure § 382, California Civil Code § 1781, California Rules of  
7 Court §§ 3.766 and 3.769, the California and United States Constitutions, and other applicable  
8 law.

9           7.       The Court further approves the procedures for Class Members to opt-out of or  
10 object to the Settlement, as set forth in the Notice of Settlement and the Settlement Agreement.  
11 The procedures and requirements for filing objections in connection with the final fairness hearing  
12 are intended to ensure the efficient administration of justice and the orderly presentation of any  
13 Class Member's objection to the Settlement, in accordance with the due process rights of all Class  
14 Members.

15           8.       The Court directs the Settlement Administrator to mail the Notice of Settlement to  
16 the members of the Class in accordance with the terms of the Settlement.

17           9.       The Notice of Settlement shall provide 60 calendar days' notice for Class Members  
18 to submit disputes, opt-out of, or object to the Settlement.

19           10.      The hearing on Plaintiff's Motion for Final Approval of Settlement on the question  
20 of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled  
21 in Department 1 of this Court, located at 312 North Spring Street, Los Angeles, California 90012,  
22 on 04/24/2025, 2025 at 10:00 a.m/~~a.m.~~ p.m.

23           11.      At the Final Fairness hearing, the Court will consider: (a) whether the Settlement  
24 should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting  
25 final approval of the Settlement should be entered; and (c) whether Plaintiff's application for  
26 service and release awards, settlement administration costs, and Class Counsel's attorney's fees  
27 and costs, should be granted.  
28

12. Counsel for Plaintiff shall file memoranda, declarations, or other statements and materials in support of their request for final approval of Plaintiff's application for service and release awards, settlement administration costs, Class Counsel's attorneys' fees and costs, prior to the hearing on Plaintiff's Motion for Final Approval of Settlement according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	Date
Defendant to provide class contact information to Settlement Administrator no later than:	<u>Thursday, August 14, 2025</u> [14 calendar days following preliminary approval]
Settlement Administrator to mail the Notice of Settlement to the Class no later than:	<u>Thursday, August 21, 2025</u> [7 calendar days following provision of contact information]
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	<u>Friday, September 19, 2025</u> [60 calendar days after mailing of the Notice of Settlement]
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	<u>Monday, September 22, 2025</u> [16 court days before the Final Approval Hearing]
Hearing on Motion for Final Approval of Settlement (suggested date September 18, 2025)	<u>Monday, September 22, 2025 10:00 AM</u>

14. Pending the Final Fairness hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed. To facilitate administration of the Settlement pending final approval, the Court hereby enjoins Plaintiff and all members of the Class from filing or prosecuting any claims, or suits regarding claims released by the Settlement, unless and until such Class Members have filed valid Requests for Exclusion with the Settlement Administrator.

1           15.     The Court has preliminarily approved Settlement Administration Costs not to  
2 exceed \$15,000.00, with a final determination to be made at the Final Fairness Hearing.

3           16.     The Court has preliminarily approved Class Counsel's Attorneys' Fees not to  
4 exceed \$349,999.65, for Plaintiff's firm, with a final determination to be made at the Final Fairness  
5 Hearing. However, attorney fees will be limited to one-third of the gross recovery absent  
6 extraordinary circumstances.

7           17.     The Court has preliminarily approved Class Counsel's Costs not to exceed  
8 \$30,000.00, for Plaintiff's firm, with a final determination to be made at the Final Fairness Hearing.

9           18.     The Court has preliminarily approved the Service and Release Award to  
10 Representative Plaintiff in an amount not to exceed \$7,500.00, with a final determination to be  
11 made at the Final Fairness Hearing.

12           19.     PAGA Penalties in the amount not to exceed \$50,000.00 (\$37,500.00 to the Labor  
13 and Workforce Development Agency ("LWDA") and \$12,500.00 to the PAGA Members).

14           20.     Below is a table setting forth the Gross Settlement Amount, less all estimated  
15 deductions and the estimated Net Settlement Amount that will be available for distribution to the  
16 class:

17

Gross Settlement Amount	\$999,999.00
Enhancement Payment	\$7,500.00
Class Counsel's Fees	\$349,999.65*
Class Counsel's Costs	\$30,000.00
PAGA Payment	\$50,000.00
Settlement Administration Costs	\$15,000.00
Net Settlement Amount	\$547,499.35

25           \* This is 35% of the Gross Settlement Amount, but attorney fees will be limited to one-  
26 third of the gross recovery absent extraordinary circumstances.

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21. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

**IT IS SO ORDERED.**



A handwritten signature in black ink, appearing to read "Stuart M. Rice", is written over the official seal.

DATED: 07/14/2021

By: Stuart M. Rice / Judge  
Hon. Stuart M. Rice  
JUDGE OF THE SUPERIOR COURT