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on behalf of herself and others similarly situated

12 [Additional counsel listed on following page]

13  
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **FOR THE COUNTY OF SAN DIEGO**

16 AMANDA REDMOND, on behalf of  
herself and others similarly situated,

17 Plaintiff,

18 vs.

19 FLATIRON WEST, INC. dba FLATIRON  
20 CONSTRUCTORS INC., a Delaware  
Corporation; FLATIRON  
21 CONSTRUCTION CORP., a Delaware  
Corporation; and DOES 1 through 50,  
22 inclusive,

23 Defendants.

ELECTRONICALLY FILED  
Superior Court of California,  
County of San Diego  
5/2/2025 12:32:50 PM  
  
Clerk of the Superior Court  
By J. Siharath ,Deputy Clerk

Case No. 37-2023-00008174-CU-OE-CTL

Judge: Hon. Judy Bae  
Department: C-62  
CLASS ACTION

**REVISED ~~PROPOSED~~ ORDER  
GRANTING MOTION FOR AN ORDER (1)  
PRELIMINARILY APPROVING THE  
CLASS ACTION SETTLEMENT, (2)  
APPROVING NOTICE OF CLASS ACTION  
SETTLEMENT, AND (3) SETTING  
HEARING FOR FINAL APPROVAL**

*[Filed concurrently with Plaintiff's Notice of  
Motion and Motion; Memorandum of Points and  
Authorities; Declaration of Roman Shkodnik;  
Declaration of Sean Hartranft; Declaration of  
David Yeremian; and Declaration of Walter  
Haines]*

Date: May 2, 2025  
Time: 9:10 a.m.  
Dept.: C-62

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1 Plaintiff Amanda Redmond ("Plaintiff") filed a Motion (the "Motion") for an Order (1)  
2 preliminarily approving the Class Action and Private Attorneys General Act of 2004 ("PAGA")  
3 reached between the parties; (2) approving the Notice of Class Action Settlement, and (3) setting  
4 the final approval hearing. The hearing on the Motion was set for May 2, 2025, at 9:10 a.m., at  
5 the Hall of Justice, 330 W Broadway, San Diego, California, 92101 Department C-62. Defendant  
6 Flatiron West, Inc. ("Defendant" erroneously sued as Flatiron Constructors Inc., the purported  
7 dba, and Flatiron Construction Corp.), did not oppose the Motion. (Plaintiff and Defendant shall  
8 be collectively referred to herein as the "Parties").

9 The Court, having considered Plaintiff's Motion, the Memorandum of Points and  
10 Authorities in support thereof and supporting evidence and Declaration, and Defendant's  
11 agreement with and/or non-opposition to the Motion, hereby ORDERS, ADJUDGES, AND  
12 DECREES as follows:

13 1. The Preliminary Approval Motion is GRANTED and the Parties' Class Action and  
14 PAGA Settlement Agreement and Addendum (the "Settlement" or "Settlement Agreement")  
15 attached to the Declaration of Roman Shkodnik is preliminarily approved.

16 2. This Order incorporates by reference the definitions in the Settlement Agreement  
17 and all terms defined therein shall have the same meaning in this Order, with the exception of the  
18 modifications of the deadlines for Class Members to <sup>opt out</sup> ~~opt out~~, provide written objections, and/or  
19 dispute the number of workweeks from 30 days to 45 days as requested by the Court.

20 3. The Class is preliminarily certified for settlement purposes only. The class is  
21 defined as: all current and former non-exempt employees of Flatiron West, Inc. in the state of  
22 California employed during the Class Period. The Class Period is the period from February 27,  
23 2019, through May 30, 2024. The PAGA Group is defines as all current and former hourly-paid  
24 or non-exempt employees employed by Defendant in the State of California employed during the  
25 PAGA Release Period. The PAGA Release Period is the period from February 24, 2022, through  
26 May 30, 2024. Should the Settlement not become final, this Order shall be rendered null and  
27 void and shall be vacated, and the fact that the Parties were willing to stipulate to class  
28 certification as part of the settlement shall have no bearing on, nor be admissible in connection



1 with, the issue of whether a class should be certified in a non-settlement context. Should the  
2 Settlement not become final, the Parties shall revert to their respective positions prior to notifying  
3 the Court of the settlement of the action.

4         4.       The class action settlement contemplated by the Settlement Agreement is  
5 preliminarily approved based upon the terms set forth in the Settlement Agreement. The class  
6 action settlement appears to be fair, adequate, and reasonable to the Class. The class action  
7 settlement contemplated by the Settlement Agreement falls within the range of reasonableness  
8 that could ultimately be granted final approval by the Court. The preliminary approval of the class  
9 action settlement includes the approval for purposes of the settlement of David Yeremian of  
10 David Yeremian & Associates, Inc., Roman Shkodnik and Emma Geesaman of D.Law, Inc., and  
11 Walter Haines of United Employees Law Group, P.C., as Class Counsel; Amanda Redmond as  
12 Class Representative; and Apex as Class Action Administrator. Class Counsel is authorized to act  
13 on behalf of the Class Members with respect to all acts or consents required by or which may be  
14 given pursuant to the Settlement Agreement and the class action settlement contemplated by the  
15 Settlement Agreement, and such other acts reasonably necessary to consummate the settlement.  
16 The Class Action Administrator is authorized to perform such acts as set forth in this Order and  
17 the Settlement Agreement.

18         5.       The Court approves the Parties' allocation of \$64,600.00 to settle claims under the  
19 Labor Code Private Attorneys General Act of 2004 ("PAGA"). Pursuant to Labor Code § 2699(i),  
20 75% of this amount, or \$48,450.00, shall be paid to the California Labor & Workforce  
21 Development agency and the remaining 25%, or \$16,150.00, shall be paid to Class Members in  
22 the manner set forth in the Settlement Agreement.

23         6.       The Notice of Class Settlement ("Class Notice" or "Notice"), attached to the  
24 Settlement as **Exhibit A**, advising the Class of material terms and provisions of this settlement,  
25 the procedure for approval thereof, and their rights with respect thereto are approved as to form  
26 and content. The Court approves the procedure set forth in the Settlement Agreement for Class  
27 Members to participate in, opt out of, and object to the Settlement, with the modifications of the  
28 deadlines for Class Members to opt-out, provide written objections, and/or dispute the number of

workweeks from 30 days to 45 days as set forth in the amended Notice.

7. The Notice shall be sent by first class mail to the Class in accordance with the schedule set forth below. The dates selected for the mailing and distribution of the Notice Packet as set forth below meet the requirements of due process and provide the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto:

a. Deadline for Defendants to provide to Class Action Administrator the class list and related information in electronic form: 14 calendar days after the Order granting preliminary approval.

b. Deadline for Class Action Administrator to mail the Class Notice by first-class regular U.S. mail: 5 calendar days after receiving the class list and related information.

c. Deadline for class members to mail requests to dispute workweek calculations to the Class Action Administrator: 45 calendar days after the mailing of the Notice.

d. Deadline for class members to mail requests for exclusion to the Class Action Administrator: 45 calendar days after the mailing of the Notice.

e. Deadline for class members to mail objections to the Class Action Administrator: 45 calendar days after the mailing of the Notice

f. Deadline for Class Counsel to file a Motion for Final Approval and a Motion for Attorneys' Fees is per Code.

g. A Final Approval Hearing on the question of whether the proposed settlement, attorneys' fees and costs to Class Counsel, and the class representative enhancement should be approved as fair, reasonable, and adequate as to the Settlement Class: November 7, 2025 at 9:10 a.m. in Dept. 62.

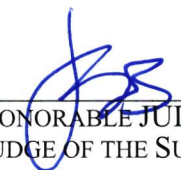
8. The Joint Stipulation shall not be construed as an admission or evidence of either liability or the appropriateness of class certification in the non-settlement context, as more specifically set forth in the Joint Stipulation. Entry of this Order is without prejudice to the rights

1 of Defendants to oppose certification of a class in this action should the proposed settlement not  
2 be granted final approval.

3 10. All further proceedings in this action shall be stayed except such proceedings  
4 necessary to review, approve, and implement this Settlement.

5 **IT IS SO ORDERED.**

6  
7 DATED: 5/2/2025

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HONORABLE JUDY BAE  
JUDGE OF THE SUPERIOR COURT