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11 Attorneys for Plaintiff and the Settlement Class

12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14  
15 **Paula Norton**, individually and on behalf  
of all similarly situated individuals,

16  
17 Plaintiff,

18 vs.

19 **Strategic Staffing Solutions-S3, L.L.C.**, a  
Florida limited liability company; **Cynthia**  
20 **J. Pasky**, an individual; and **Does 1-100**,  
inclusive;

21  
22 Defendants.

CASE NO. 3:23-cv-06648-JSC

Assigned to Hon. Jacqueline Scott Corley

**CLASS ACTION**

**NOTICE REGARDING POST-  
DISTRIBUTION ACCOUNTING**

King & Siegel ||| LLP

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD,**

In compliance with the Court's June 12, 2025 Order (Dkt. No. 53), and the Northern District Procedural Guidance for Class Action Settlements, Class Counsel provides the following Post-Distribution Accounting<sup>1</sup>:

Total settlement fund	\$5,250,000.00
Total number of class members	445
Total number of class members to whom notice was sent and not returned as undeliverable	442
The number and percentage of claim forms submitted	N/A: no claim forms required
The number and percentage of opt-outs	0; 0%
The number and percentage of objections	0; 0%
The average and median recovery per claimant	\$8,193.73; \$6,476.74
The largest and smallest amounts paid to class members	\$39,697.72; \$143.93
The method(s) of notice and the method(s) of payment to class members	By U.S. Mail and Email; By Check
The number and value of checks not cashed	172; \$1,131,427.86 (as of July 30, 2025)
The amounts distributed to each <i>cy pres</i> recipient	N/A: Check cashing deadline is January 6, 2026; Class Counsel will file an updated report at that time.
The administrative costs	\$8,500.00

<sup>1</sup> While the Northern District Procedural Guidance for Class Action Settlements provides that this accounting shall be submitted within 21 days of the checks going stale, the Court's Order at Dkt. No. 53 provides that Class Counsel submit this accounting "[w]ithin 21 days after the distribution of the settlement funds and payment of attorneys' fees." As such, out of an abundance of caution, Class Counsel intends to submit this within 21 days of payment of attorneys' fees and again within 21 days of the checks going stale.

1 The attorneys' fees and costs	\$1,164,600.43 for fees; \$28,098.29 for costs
3 The attorneys' fees in terms of percentage of the settlement fund	25% of the Net Settlement Amount
5 The multiplier	3.39

6  
7 On July 30, 2025, Ryan McNamee of Apex Class Action, LLC, provided Class  
8 Counsel with a declaration regarding disbursement of settlement funds. Attached herein as  
9 **Exhibit A** is a true and correct copy of Mr. McNamee's declaration.

10  
11 Dated: July 30, 2025

**KING & SIEGEL LLP**

12  
13  
14 By: Elliot J. Siegel  
Elliot J. Siegel

15 Attorney for Plaintiff and the Settlement Class

16  
17 Dated: July 30, 2025

**LAW OFFICE OF XAVIER VILLEGAS,  
APC**

18  
19 By: Xavier Villegas  
Xavier Villegas

20 Attorney for Plaintiff and the Settlement Class

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12 Class

13 [Additional Counsel on the next page]

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **Paula Norton**, individually and on behalf of  
17 all similarly situated individuals,

18 Plaintiff,

19 vs.

20 **Strategic Staffing Solutions-S3, L.L.C.**, a  
Florida limited liability company; **Cynthia J.**  
21 **Pasky**, an individual; and **Does 1-100**,  
inclusive;

22 Defendants.

Case No.: 3:23-cv-006648-JSC

Assigned for All Purposes To:

Hon. Jacqueline Scott Corley

Ctrm: 8

**DECLARATION OF RYAN MCNAMEE OF  
APEX CLASS ACTION, LLC, REGARDING  
DISBURSEMENT OF SETTLEMENT FUNDS**

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19 Attorneys for Defendants

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1 I, Ryan McNamee, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a Case Manager  
3 for Apex Class Action, LLC (hereinafter referred to as “Apex”), the professional settlement services  
4 provider appointed by the Court to serve as the Settlement Administrator for the above-captioned *Norton*  
5 *v. Strategic Staffing Solutions* matter. On behalf of both Apex and myself, I possess the authority to  
6 issue this declaration. I am personally acquainted with the information contained herein, and in the event  
7 of being summoned to provide testimony, I am fully capable and willing to provide competent testimony  
8 regarding these facts.

9 **Regarding Notice**

10 2. As stated in my May 27, 2025 Declaration, Apex provided notice to the Class by U.S. mail on  
11 February 7, 2025. The Notice Packet was sent to all 445 individuals listed in the Class List using U.S.  
12 First Class Mail. 3 Notice Packets have been considered undeliverable as no updated address was found  
13 despite conducting skip tracing. On April 18, 2025, in accordance with the Court’s April 14, 2025 Order,  
14 the Notice Packet was emailed to all 445 individuals listed in the Class List. On May 15, a reminder  
15 email was sent to 67 Class Members who had not opened previous emails containing the Notice Packet.  
16 As of the date of this declaration, 66 of those emails were determined to be deliverable, and 37 of them  
17 were opened.

18 3. Apex received a total of 2 requests for exclusion from the combined mail and email notice. Apex  
19 did not receive any objections or disputes to the Settlement through the combined mail and email notice.  
20 Thus, there were 443 Participating Class Members out of a total 445 Settlement Class Members.

21 **Regarding Distribution.**

22 4. On July 3, 2025, Apex received the Settlement Payment totaling \$5,451,127.37, comprising  
23 the Gross Settlement Amount of \$5,250,000.00 and the Employer-side Payroll Taxes in the amount of  
24 \$201,127.37. The itemized breakdown is as follows:

- 25 a. \$3,488,801.28 for gross payment of the Individual Settlement Payments to the 443
- 26 Settlement Class Members and \$137,500.00 to the 177 Aggrieved Employees;
- 27 b. \$1,164,600.43 for payment of Class Counsel’s attorney fees;
- 28 c. \$28,098.29 for payment of Class Counsel’s costs;

- 1 d. \$10,000.00 for a Service Award to Plaintiff Paula Lynn Norton;
- 2 e. \$8,500.00 for payment of settlement administration costs to Apex;
- 3 f. \$412,500.00 for the payment to the California Labor and Workforce Development
- 4 Agency (“LWDA Payment”); and
- 5 g. \$201,127.37 for the payment of the employer’s portion of applicable payroll taxes on the
- 6 “wages” portion of the Individual Settlement Payments.

7 5. The Settlement did not require any Class Members or Aggrieved Employees to make claims to  
8 receive their individual payments.

9 6. On July 10, 2025, the payment of Class Counsel’s attorney fees, in the amount of \$1,164,600.43,  
10 was completed.

11 7. On July 10, 2025, the payment of Class Counsel’s costs, in the amount of \$28,098.29, was  
12 completed.

13 8. On July 10, 2025, Apex issued and mailed a Service Award to Plaintiff Paula Lynn Norton, in  
14 the amount of \$10,000.00.

15 9. On July 10, 2025, payment of the settlement administration costs to Apex, in the amount of  
16 \$8,500.00, was completed.

17 10. On July 10, 2025, Apex issued and mailed the LWDA Payment, in the amount of \$412,500.00.

18 11. On July 10, 2025, Apex issued and mailed via U.S. Postal Service (USPS) the Individual  
19 Settlement Payment checks to the 445 Settlement Class Members. The total net amount sent to  
20 Settlement Class Members was \$3,234,334.46, as \$391,966.82 was withheld for all applicable employee  
21 payroll taxes. This total includes the \$137,500.00 allocated to the 177 Aggrieved Employees.

22 12. The average recovery per claimant, combining both Class and PAGA awards, is \$8,193.73. The  
23 median recovery per claimant is \$6,476.74. The maximum recovery is \$39,697.72. The minimum  
24 recovery is \$143.93.

25 13. As of July 30, 2025, 172 checks in the amount of \$1,131,427.86 remain uncashed. These checks  
26 represent a combined Class and PAGA award amount.

27 14. On July 10, 2025, payment to the Internal Revenue Service, for all applicable Federal payroll  
28 taxes, in the amount of \$449,934.26, was completed.

1 15. On July 10, 2025, payment to the Employment Development Department, for all applicable State  
2 payroll taxes in the amount of \$143,159.93, was completed.

3 16. The deadline for the Participating Settlement Class Members to cash their Individual Settlement  
4 Payment check is January 6, 2026 (180 days after issuance). Pursuant to Settlement Agreement finally  
5 approved by the Court, the uncashed funds will be sent to the California Bar's Justice Gap Fund after the  
6 check void date.

7  
8 I declare under penalty of perjury under the laws of the State of California and the United States  
9 that the foregoing is true and correct and that this Declaration was executed this 30th day of July 2025,  
10 in Irvine, California.

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13 RYAN MCNAMEE  
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