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KING COUNTY
SUPERIOR COURT CLERK
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Honorable David Whedbee
Hearing Date: May 29, 2025
Without Oral Argument

CASE #: 24-2-23566-3 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

EDITH RAMIREZ, individually and on behalf
of all those similarly situated,

Plaintiff,

vs.

GENIE INDUSTRIES INC, and JOSHUA
GROSS individually, and his marital
community, if any

Defendants.

Case No. 24-2-23566-3 SEA

ORDER GRANTING PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

(CLERK'S ACTION REQUIRED)

This matter came before the Court on Plaintiff's Unopposed Motion for Conditional Settlement, Class Certification, and Preliminary Approval of Class Action Settlement ("Plaintiff's Motion"). The Court considered the following:

1. Plaintiff's Motion;

2. The Declaration of Ed Hones in support of Plaintiff's Motion and Exhibits attached thereto, including the Settlement Agreement and Proposed Notice to the Class;
3. Oral argument, if heard; and
4. The files and records herein.

Having fully considered the matter the Motion is hereby **GRANTED**. It is further **ORDERED** that:

1. The parties' settlement is granted preliminary approval as it meets the criteria for preliminary settlement approval, appears to be the product of arm's length and informed negotiations, and appears to be fair, adequate, and reasonable to the Class.
2. The Court approves, as to form, content, and method of delivery, the Notice of Class Action Settlement, attached as Exhibit A to the Settlement Agreement ("Class Notice").
3. The Court appoints CPT Group, Inc. as the Settlement Administrator.
4. The Court provisionally certifies the following settlement class:
 - a. All individuals employed by Genie Industries, Inc., Terex Washington, Inc., and Terex USA, LLC in Washington state in positions paid on an hourly basis at any time during the Settlement Class Period (i.e., between October 4, 2021 and March 31, 2025).
5. Class members will be bound by the terms of the Settlement Agreement unless they submit a timely Request for Exclusion (opt out) within 30 days after the mailing of the Class Notice by the Settlement Administrator.
6. The Court orders the following schedule of dates for further proceedings:

EVENT	SCHEDULED DATE
Deadline for Class Counsel to provide Settlement Administrator with information for Notice	21 days after entry of Preliminary Approval
Deadline for mailing Notice	30 days after entry of Preliminary Approval Order
Deadline to Opt-Out, Object or Challenge Share Forms	45 days after mailing Notice
Parties receive from Settlement Administrator the total number of exclusions, objections, and challenges from Class Members	No later than 5 days after the deadline for objections to the Settlement
Class Counsel to file the Motion for Final Approval and supporting documents	No later than 10 days prior to the Final Fairness Hearing
Final Fairness Hearing	No earlier than 30 days after the Deadline to Submit Claims, Opt-out, or Object, and no later than 50 days after this deadline. (HEARING DATE TO BE SET BY THE COURT)
Settlement Effective Date	The date when both (i) the Settlement has been finally approved by the Superior Court, and (ii) the Superior Court's order approving the Settlement and dismissing this Case with prejudice becomes final.
Defendants to fund Settlement	Within 10 days after Settlement Effective Date.
Settlement Administrator to issue checks for Service and Full Release Award, Settlement Administration Expenses Award, and Attorney's Fees and Costs Award.	Within three (3) business days after the Maximum Settlement Amount is deposited into the QSF.

1 Settlement Administrator to issue
2 Settlement Award checks to class
3 members.

Within 10 business days after the
Maximum Settlement Amount is deposited
into the QSF.

4
5 THE COURT HEREBY SETS THE FINAL APPROVAL HEARING AT THE
6 FOLLOWING DATE AND TIME:

7 **Wednesday, August 27, 2025 at 11:00 AM**

8 By Zoom using the following link:

9 Recurring Zoom
10 <https://kingcounty.zoom.us/j/83726036501>
11 Meeting ID: 837 2603 6501
12

13 DATED this ____ day of ____ 2025
14
15

16 The Honorable David Whedbee
17 *Judge, King County Superior Court*
18

19 Presented by:

20 HONES LAW PLLC

21 s/ Ed Hones
22 Ed Hones, WSBA #58275
23 Ari Robbins Greene, WSBA #54201
24
25
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**King County Superior Court
Judicial Electronic Signature Page**

Case Number: 24-2-23566-3 SEA
Case Title: RAMIREZ VS GENIE INDUSTRIES ET ANO

Document Title: Order

Date Signed: 06/03/2025



Judge: David Whedbee

Key/ID Number: *257316943*

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