

ORIGINAL

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RECEIVED
LOS ANGELES SUPERIOR COURT

JAN 14 2020

S. DREW

FILED
Superior Court of California
County of Los Angeles

JAN 17 2020

Sherri R. Carter, Executive Officer/Clerk
By Berta Jauregui, Deputy
Berta Jauregui

6 Attorneys for Plaintiff CHRISTINE DANELIAN
on behalf of herself and the Settlement Class

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

11 CHRISTINE DANELIAN, an individual, on
behalf of herself and all others similarly
12 situated

13 Plaintiff,

14 v.

15 MEDIX STAFFING SOLUTIONS, INC., an
Illinois corporation; CITY OF HOPE
16 NATIONAL MEDICAL CENTER, a
California corporation; CITY OF HOPE, an
17 entity of unknown form; and DOES 1
through 50, inclusive,

18 Defendants.

Case No.: BC649846
Consolidated with Lead Case No. BC630925

CLASS ACTION

Assigned for all purposes to:
Hon. Kenneth R. Freeman
Dept. 14, Spring Street Courthouse

~~PROPOSED~~ FINAL JUDGMENT

[Filed concurrently with Notice of Motion and
Motion for Final Approval; Memorandum of
Points and Authorities; Declarations of Sofia
Munoz, David Yeremian, Alvin B. Lindsay, and
Christine Danelian; and [Proposed] Order]

Following Hearing on:
Date: January 14, 2020
Time: 9:00 a.m.
Dept.: 14, 312 North Spring Street, Los Angeles

Complaint Filed: February 8, 2017
First Amended Complaint: March 6, 2017
Trial Date: None Set

BY FAX

01/27/2020

1 JUDGMENT

2 The Court has received and considered the motion for final approval of the Amended Joint
3 Stipulation of Class Settlement and Release (“Settlement”) between Plaintiff CHRISTINE
4 DANELIAN (“Plaintiff”) on behalf of herself and all other similarly situated employees, and
5 Defendants MEDIX STAFFING SOLUTIONS, INC., CITY OF HOPE and CITY OF HOPE
6 NATIONAL MEDICAL CENTER (“Defendants”). The Court granted preliminarily approval to
7 the Settlement on August 29, 2019, and administration was successfully completed.

8 There were no written objections or requests for exclusion submitted by the Settlement
9 Class members, and none appeared at the final fairness and approval hearing. There are 31
10 participating Settlement Class members, defined as “all persons who are currently employed, or
11 formerly have been employed, by Medix as Clinical Research Coordinators at City of Hope at any
12 time between February 8, 2013 and July 1, 2018, and who do not timely opt out of the Settlement
13 Amended Settlement Agreement.”

14 The Court has finally approved the allocations of funds from the Gross Settlement
15 Amount, and has found the Settlement to be fair, reasonable, and adequate. Defendants and their
16 counsel have approved the form and content of this Judgment, do not object to it, and will not
17 contest its entry.

18 **NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED:**

19 The Court having entered an order granting Final Approval of the Settlement in this action
20 hereby enters FINAL JUDGMENT in favor of Plaintiff and the Class Members in the amount of
21 One Hundred and Fifty Thousand Dollars (\$150,000.00).

22 This Judgment shall bar Plaintiff and the Settlement Class members from bringing any
23 action asserting any of the Released claims, and Defendants and the Released Parties are hereby
24 discharged from all Released Claims in accordance with the terms of the Settlement, including a
25 release of all claims for wages, statutory and civil penalties, damages and liquidated damages,
26 interest, injunctive or equitable relief, attorney’s fees and costs that were or could have been
27 alleged and whether known or unknown under the laws of California arising out of the allegations
28 of the Complaint, during the applicable class period, and including those further claims as

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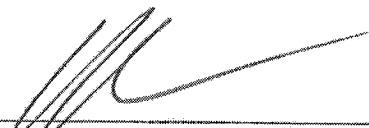
1 specified in the Settlement.

2 Without affecting the finality of this Judgment, the Court shall retain continuing
3 jurisdiction over this action and the parties, including all Class Members and over all matters
4 pertaining to the implementation and enforcement of the terms of the Settlement. Except as
5 provided to the contrary herein, any disputes or controversies arising with respect to interpretation,
6 enforcement or implementation of the Settlement shall be presented by motion to the Court for
7 resolution.

8 This Judgment is intended to be a final disposition of the above-captioned action in its
9 entirety and is intended to be immediately appealable. Subject to the Court's continuing
10 jurisdiction as set forth above, the Court directs the Clerk of the Court to enter Judgment.

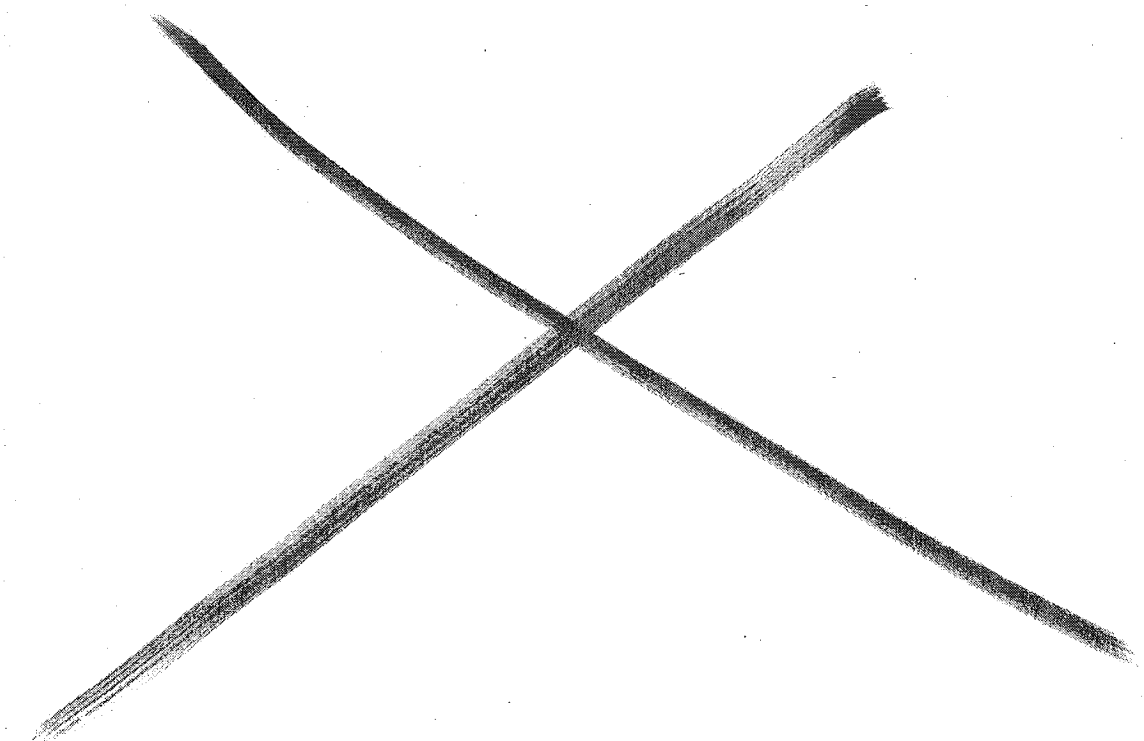
11
12 **IT IS SO ORDERED.**

13
14 Dated: Jan. 17, 2020



15 Hon. Kenneth R. Freeman
16 Judge of the Superior Court

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is 535 N. Brand, Blvd. Suite 705, Glendale CA 91203.

On January 14, 2020, I served the foregoing: **[PROPOSED] FINAL JUDGMENT** on Interested Parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Roxanne M. Wilson
Alexus B. Payton
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Los Angeles, CA 90071

Attorneys for Defendants City of Hope and
City of Hope National Medical Center

James N. Nelson
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Los Angeles, CA 90067

Attorneys for Defendant Medix Staffing Solutions, Inc.

Jonathan LaCour
PIERRE LACOUR PC
2655 N. Pine Street
Pomona, CA 91767

Attorney for Plaintiff Christine Danelian

(BY MAIL) I placed such envelope with postage thereon fully paid in the United States mail at Glendale, California. I am "readily familiar" with this firm's practice of collecting and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

(BY ELECTRONIC SERVICE VIA CASE ANYWHERE) Based on a court order, I caused the above-entitled document(s) to be served through Case Anywhere at www.caseanywhere.com addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the Case Anywhere Filing Receipt Page/Confirmation will be filed, deposited, or maintained with the original document(s) in this office.

(STATE) I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 14, 2020, at Glendale, California.


Natalia Bermudes