1 2 3 4 5 6 7 8	SETAREH LAW GROUP SHAUN SETAREH (SBN 204514) shaun@setarehlaw.com THOMAS SEGAL (SBN 222791) thomas@setarehlaw.com 9454 Wilshire Boulevard, Suite 907 Beverly Hills, CA 90212 Telephone: (310) 888-7771 Facsimile: (310) 888-0109 Attorneys for Plaintiff, NORA SALAMANCA, and all others similarly situated, and the general public	NETRICE COURT				
9	UNITED STATES DISTRICT COURT					
10	NORTHERN DISTRICT OF CALIFORNIA					
11	NORA SALAMANCA, on behalf of herself	Case No. 4:15-cv-05084-JSW				
12	and all others similarly situated, and the general public,	IDD ODOGEDI ODDED				
13	Plaintiff,	[PROPOSED] ORDER: (1) PRELIMINARILY APPROVING				
14		PROPOSED SETTLEMENT;				
15	VS.	(2) CONDITIONALLY CERTIFYING SETTLEMENT CLASS;				
16	SPRINT/UNITED MANAGEMENT COMPANY, a Kansas corporation; and DOES	(3) APPOINTING CLASS REPRESENTATIVE, CLASS				
17	1-50, inclusive,	COUNSEL, AND SETTLEMENT				
18	Defendants.	ADMINISTRATOR; (4) APPROVING NOTICE OF CLASS				
19		SETTLEMENT; AND (5) SETTING HEARING FOR FINAL				
20		APPROVAL OF SETTLEMENT AS MODIFIED				
21		Hearing Date: September 8, 2017				
22		Time: 9:00am Courtroom: 5				
23		Courtioonii. 3				
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WHEREAS, Plaintiff Nora Salamanca seeks to certify a class consisting of "All persons employed by Sprint in California who earned paid vacation days including, but not limited to, floating holidays between August 14, 2011 and September 8, 2017 who were terminated on or before September 8, 2017" (the "Settlement Class" or "Class Members"), solely for the purpose of entering a settlement in this matter;

WHEREAS, Plaintiff Nora Salamanca ("Plaintiff"), on behalf of herself and on behalf of the proposed Settlement Class, and Defendant Sprint/United Management Company ("Sprint" or "Defendant") (collectively, the "Parties") have agreed, subject to Court approval, to settle the above-captioned litigation upon the terms set forth in the Joint Stipulation and Settlement Agreement (the "Settlement Agreement");

WHEREAS, this Court has reviewed and considered the Parties' Settlement Agreement, the record in this case, the briefs and arguments of counsel, and supporting exhibits;

WHEREAS, Plaintiff has moved, unopposed, for an order granting preliminary approval of the Settlement Agreement;

NOW, THEREFORE, IT IS HEREBY ORDERED:

- 1. The Court grants preliminary approval of the Settlement Agreement and the Settlement Class based upon the terms set forth in the Parties' Settlement Agreement.
- 2. The Settlement Agreement falls within the range of possible approval as fair, adequate, and reasonable, and appears to be the product of arm's-length and informed negotiations and to treat all Class Members fairly.
- 3. A final fairness hearing on the question of whether the proposed settlement, attorneys' fees and costs, and the Class Representative Enhancement Payment should be finally approved as fair, reasonable, and adequate as to the Class Members ("Final Approval Hearing") is hereby set in accordance with the schedule set forth below.
- 4. The Parties' proposed notice plan is constitutionally sound because individual notices will be mailed to all Class Members whose identities are known to the Parties, and such

notice is the best notice practicable. The proposed Notices of Class Action Settlement (Exhibits A and A-1 to the Settlement Agreement) are sufficient to inform Class Members of the terms of the Settlement Agreement, their rights under the Settlement Agreement, their rights to object to the Settlement Agreement, their rights to dispute their amounts due under the Settlement Agreement, their rights to elect not to participate in the Settlement, the processes for doing so, and the date and location of the Final Approval Hearing, and are therefore approved.

- 5. This Court directs the mailing of the Notices of Class Action Settlement by first class mail to the Settlement Class in accordance with the schedule set forth below.
- 6. The following class is certified solely for the purpose of entering a settlement in this matter:
 - "All persons employed by Sprint in California who earned paid vacation days including, but not limited to, floating holidays between August 14, 2011 and September 8, 2017 who were terminated on or before September 8, 2017."
- 7. The Court confirms (i) Nora Salamanca as Class Representative for settlement purposes; and (ii) The Setareh Law Group as Class Counsel for settlement purposes.
- 8. The Court confirms CPT Group Inc. ("CPT Group") as the Settlement Administrator.
- 9. Plaintiff's motion for attorneys' fees shall be filed in accordance with the schedule set below and will be filed in compliance with the Northern District of California Local Rules regarding noticed motions, and will be filed at least 21 calendar days prior to the deadline for Settlement Class Members to object to the Settlement.
- 10. Any person who desires to file an objection to the Settlement Agreement or request exclusion from the Settlement Class shall do so by January 17, 2018, in conformance with the provisions of the Notices of Class Action Settlement.

11.

- Action Clerk, United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612, or by filing them in person at any location of the United States District Court for the Northern District of California; and (c) be postmarked on or before January 17, 2018.

 12. Class Counsel shall file their motion for final approval of settlement, and all supporting documentation and papers, no later than December 27, 2017.
- 13. Either Party's counsel may file a written response to any objections to the Settlement Agreement or to the application for attorneys' fees, reimbursement of expenses, and Class Representative Enhancement Payment, no later than February 7, 2018, 21 days after the deadline for filing objections.

In particular, all written objections and supporting papers, if any, must (a) clearly

identify the case name and number (Salamanca v. Sprint/United Management Company, Case

No. 4:15-cv-05084-JSW); (b) be submitted to the Court either by mailing them to the Class

- 14. At the Final Approval Hearing, Class Counsel shall provide the Court with any updated information available as of that date concerning any requests for exclusion received from the Settlement Class, any objections received from the Settlement Class, or any other communications received in response to the Notices of Class Action Settlement.
- 15. At or after the Final Approval Hearing, the Court shall determine whether the Settlement Agreement, the motion for attorneys' fees and expenses, and any service awards shall be approved.
- 16. All reasonable expenses incurred in notifying the Settlement Class and administering the Settlement shall be paid as set forth in the Settlement Agreement.
- 17. Neither the Settlement Agreement, nor any of its terms or provisions, nor any of the negotiations or proceedings connected with it, shall be construed as a concession or admission by Plaintiff or Defendant, respectively, of the truth or falsity of any of the allegations made, or of any liability, fault, or wrongdoing of any kind.

18. The Court orders the following schedule for further proceedings:

Deadline for Sprint to submit Class	[20 calendar days after Order granting	
Member contact information to CPT	Preliminary Approval]	
Group	September 28, 2017	
Deadline for CPT Group to mail Class	[21 calendar days after receipt of Class Member	
Notice	contact information]	
	October 19, 2017	
First mailing of reminder postcards	[20 calendar days after mailing of Class Notice]	
	November 8, 2017	
Deadline for Class Members to dispute	[45 calendar days after mailing of Class Notice]	
earnings information	December 4, 2017 ¹	
Second mailing of reminder postcards	[50 calendar days after mailing of Class Notice]	
	December 8, 2017	
Final mailing of reminder postcards	[70 calendar days after mailing of Class Notice]	
	December 28, 2017	
Deadline for filing motion for final	[21 calendar days before objection deadline]	
approval and motion for attorneys' fees	December 27, 2017	
Deadline for objections and requests for	[90 calendar days after mailing of Class Notice]	
exclusion	January 17, 2018	
Deadline to respond to objections	[21 calendar days after objection deadline]	
	February 7, 2018	

¹ 45 calendar days after the October 19, 2017 mailing date is December 3, 2017. However, as December 3, 2017 is a Sunday, the deadline for Class Members to dispute earnings information is extended to the next business day, December 4, 2017.

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I	II .				
1	Final Approval Hearing	March 2	_, 2018, at 9:00am		
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3	19. The Court reserves the right to	o adiourn co	ontinue or otherwise change the date of		
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5	the Final Approval Hearing without further n				
6	retains jurisdiction to consider all further applications arising out of or connected with the				
7	proposed Settlement Agreement. The Court				
8	modifications as may be agreed to by the sett	lling Parties,	if appropriate, without further notice to		
9	the final Settlement Class.				
10	IT IS SO ORDERED.				
11			and line		
12	Dated: September 8, 2017		Jeffrey & White		
13			Hon Juffrey S. White United States District Judge		
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