

THE HONORABLE CHAD ALLRED

Department 34

Noted for Hearing: November 18, 2022, at 10:00 a.m.

With Oral Argument

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

MONICA JIMENEZ, on her own behalf and on the
behalf of all others similarly situated,

Plaintiff,

V.

TTB HOLDINGS, LLC, a Washington LLC, and
KI WON JEON, individually and the marital
community composed of Ki Won Jeon and spouse,

Defendants.

No. 21-2-11619-8 KNT

~~PROPOSED~~ ORDER GRANTING
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT

1. Plaintiff's Motion for Final Approval of Class Action Settlement came before this Court on a hearing on November 18, 2022, at 10:00 a.m. The above captioned Action is a class action lawsuit brought by Plaintiff Monica Jimenez against Defendants TTB Holdings, LLC, Ki Won Jeon, and JJK Holdings ("Defendants").

2. On June 21, 2022, this Court entered an Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement. That Order directed the Settlement Administrator to provide notice to members of the Settlement Class, which informed them of: (1) the proposed Settlement and the Settlement's key terms; (2) the date, time, and location of the Final Approval

1 Hearing; (3) the right to object to the proposed Settlement and the procedure for doing so; and
2 (4) the right to opt out of the proposed Settlement and the procedure for doing so.

3 3. On September 22, 2022, this Court approved the parties' amendments to the proposed
4 Settlement which included sending a revised notice of the Settlement Agreement to additional
5 Settlement Class Members who were inadvertently not mailed the initial notice.

6 4. The Court, upon Notice having been given as required in the Preliminary Approval Order
7 and the September 22, 2022 Order approving the amendments to the Settlement Agreement, and
8 having considered the proposed Settlement Agreement, as well as all papers filed, and upon
9 conducting the Final Fairness Hearing with counsel present as proscribed in the Preliminary
10 Approval Order and set forth in the Notice disseminated to the Settlement Class, hereby
11 ORDERS, ADJUDGES AND DECREES AS FOLLOWS:

12 5. This Court has jurisdiction over this matter and over all Parties, including all members of
13 the Settlement Class. Pursuant to the agreement of the Parties, the Settlement Class includes those
14 one hundred and seventy-eight (178) individuals identified by the Parties as Settlement Class
15 Members prior to the respective deadlines for Class Members to object or opt out.

16 6. This Court confirms the proposed Settlement Class satisfies the requirements of CR 23,
17 as found in the Court's Order Granting Preliminary Approval of Class Action Settlement and
18 finds that the Settlement Class is properly certified as a class for settlement purposes.

19 7. The Notice provided to the Settlement Class conforms with the requirements of CR 23,
20 the Washington and United States Constitutions, and any other applicable law, and constitutes
21 the best notice practicable under the circumstances, by providing individual notice to all Class
22 Members who could be identified through reasonable effort, and by providing due and adequate
23 notice of the proceedings and of the matters set forth therein to the other Class Members. The
24 Notice fully satisfied the requirements of due process.

25 8. The Court finds that the Settlement was entered into in good faith as the result of arm's-
26 length negotiations between experienced attorneys, that the Settlement is fair, reasonable, and

adequate, and that the Settlement satisfies the standards and applicable requirements for final approval of this class action Settlement under Washington law, including the provisions of CR 23.

9. No Settlement Class Members have objected to or opted out of the Settlement.

10. Upon entry of this Order, compensation to the participating members of the Settlement Class shall be effected pursuant to the terms of the Settlement Agreement.

11. In addition to any recovery that Plaintiff may receive under the Settlement, and in recognition of Plaintiff's efforts on behalf of the Settlement Class, the Court hereby approves the payment of a service award to Plaintiff, in the amount of \$2,500.

12. The Court approves the payment of settlement administration expenses to Simpluris up to the amount of \$4,990.54 as set forth in the Settlement Agreement. The settlement administration expenses award shall be distributed to Simpluris in accordance with the terms of the Settlement Agreement.

13. The Court approves the payment of attorneys' fees, costs, and expenses to Class Counsel in the sum of \$56,687.69. The attorneys' fees and costs award shall be distributed to Class Counsel in accordance with the terms of the Settlement Agreement.

14. Upon the date on which this order is entered (the "Effective Date"), Plaintiff and all members of the Settlement Class shall have, by operation of this Order and the accompanying Judgment, fully, finally and forever released, relinquished, and discharged Defendants from all claims as defined by the terms of the Settlement. Upon the Effective Date, all members of the Settlement Class shall be and are hereby permanently barred and enjoined from the institution or prosecution of any and all of the claims released under the terms of the Settlement.

15. Pursuant to the Settlement Agreement, this Order shall constitute a dismissal of this action on the merits with prejudice with respect to Defendants, without fees or costs to any party except as provided in the Settlement Agreement and approved in this Order.

1 16. Without affecting the finality of this Final Approval Order and Judgment for the purposes
2 of appeal, this Court shall retain jurisdiction over all matters relating to administration,
3 consummation, enforcement, and interpretation of the Settlement Agreement and the Final
4 Approval Order, and for any other necessary purpose.

5 IT IS SO ORDERED.

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7 DATED this _____ day of 11/18, 2022.

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10 JUDGE CHAD ALLRED

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13 Presented by:

14 **REKHI & WOLK, P.S.**

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