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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

11 PAMELA CARTER, DEBORAH
12 MARTIN, CHRISTINE MORALES,
13 STANLEY CARAKER, STANLEY
14 NICKS, MICHAELA VECHT, BERT
15 SCHORLING, JEANETTE BREITEN,
16 RAYMOND BACHAR, KATHERINE
17 MITCHELL, STEPHANIE CASTRO,
18 BRUCE HINSLEY, ARLENE
19 POUNDS, individually and as
20 Representatives of All Others Similarly
21 Situated,

22 Plaintiffs,

23 vs.

24 STRATEGIC EQUITY GROUP;
25 CHRISTOPHER KRAMER;
26 SHORELINE CAPITAL, INC.;
27 EDGEWATER CAPITAL, LLC and
28 DOES 1-100, inclusive,

Defendants.

Case No.:
30-2016-00866025-CU-BT-CXC

[PROPOSED] ORDER

Date: August 22, 2019
Time: 2:00 p.m.
Dept: CX102
Judge: Hon. Peter J. Wilson

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiffs PAMELA CARTER, DEBORAH MARTIN, CHRISTINE
MORALES, STANLEY CARAKER, STANLEY NICKS, MICHAELA VECHT,
BERT SCHORLING, JEANETTE BREITEN, RAYMOND BACHAR,
KATHERINE MITCHELL, STEPHANIE CASTRO, BRUCE HINSLEY,

1 ARLENE POUNDS (“Plaintiffs” or “Class Representatives”) and Defendants
2 STRATEGIC EQUITY GROUP; CHRISTOPHER KRAMER; SHORELINE
3 CAPITAL, INC.; EDGEWATER CAPITAL, LLC (“Defendants”), through their
4 counsel of record, have reached an agreement to settle certain claims in the putative
5 class action, filed in the Superior Court of California- County of Orange- Civil
6 Complex Center, and captioned Carter, et al. v. Strategic Equity Group, et. al., Case
7 No. 30-2016-00866025-CU-BT-CXC (the “Action”).

8 This matter came before the Court on _____, for a hearing on
9 Plaintiff’s Motion For Award Of Attorneys’ Fees, Litigation Expenses, And
10 Settlement Administration Costs.

11 Having considered the papers filed in support this motion, Plaintiff’s Motion
12 For Award Of Attorneys’ Fees, Litigation Expenses, And Settlement Administration
13 Costs is granted, and

14 IT IS HEREBY ORDERED as follows:

15 1. This Order adopts and incorporates by reference the terms and
16 conditions of the parties’ Stipulation of Settlement and Release (“Settlement
17 Agreement”) together with the definitions used herein

18 2. The Court approves an award of attorney’s fees of \$33,333.33. The
19 Court finds that this amount is supported by both the application of the percentage
20 fee and the lodestar multiplier methods for awarding reasonable attorneys’ fees.

21 3. The Court further approves the reimbursement of Class Counsel’s costs
22 in the amount of \$_____, pursuant to the terms of the Settlement Agreement
23 and the submission of costs with Plaintiff’s Motion.

24 4. The Court further approves the payment in the amount of
25 \$_____, to the settlement administrator, Simpluris, for its administration of
26 the Settlement in this Action.

27 5. The Court orders that the award of attorney’s fees, reimbursement of
28 Class Counsel’s costs, and payment to the settlement administrator be paid from the

1 Gross Settlement Amount, before any monies are subtracted for purposes of
2 distribution to the Plaintiff Class.

3 3. The Court further also orders

4 _____
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9 **IT IS SO ORDERED.**

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11 Dated: _____
12 _____
13 Hon. Peter J. Wilson

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