



otherwise defined in this Order shall have the same meaning as ascribed to them in the Settlement Agreement. The Class is defined in prior Orders of this Court ([ECF No. 49](#), [ECF No. 84](#)).

Having considered Plaintiffs' Assented-To Motion for Preliminary Approval of Class Action Settlement (ECF No. 93) and the Settlement Agreement attached thereto in order to determine, among other things, whether the Settlement is sufficient to warrant the issuance of notice to members of the Class, it is hereby **ORDERED, ADJUDGED AND DECREED** as follows:

**Jurisdiction.** The Court has jurisdiction over the subject matter of this Action and over all Parties to this Action, including all members of the Class.

**Preliminary Approval of Settlement.** The Settlement documented in the Settlement Agreement is hereby **PRELIMINARILY APPROVED**, as the Court preliminarily finds that: (a) the proposed Settlement resulted from arm's-length negotiations, including one full-day mediation; (b) the Settlement Agreement was executed only after Class Counsel had researched and investigated multiple legal and factual issues pertaining to Plaintiffs' claims and litigated those claims through summary judgment; (c) the Parties exchanged extensive materials through discovery, including document discovery and multiple depositions; (d) there is a genuine controversy between the Parties involving Defendants' compliance with the WARN Act and the Massachusetts Wage Act; (e) the Settlement appears on its face to be fair, reasonable, and adequate; and (f) the Settlement evidenced by the Settlement Agreement is sufficiently fair, reasonable, and adequate to warrant sending notice of

the Settlement to the Class.

**Fairness Hearing.** A hearing (the “Fairness Hearing”) pursuant to Fed. R. Civ. P. 23(e) is hereby **SCHEDULED** to be held before the Court on June 18 2026, at 10:00AM in Courtroom 13, 5<sup>th</sup> Floor of the U.S. District Court, John Joseph Moakley United States Federal Courthouse, 1 Courthouse Way, Suite 9200 Boston, MA 02210, to determine finally, among other things:

- (a) Whether the Settlement should be approved as fair, reasonable, and adequate;
- (b) Whether the litigation should be dismissed with prejudice pursuant to the terms of the Settlement Agreement;
- (c) Whether a Final Approval Order should be entered and whether the Releasees should be released of and from the Released Claims, as provided in the Settlement Agreement;
- (d) Whether the notice and notice methodology implemented pursuant to the Settlement Agreement (i) were reasonably calculated, under the circumstances, to apprise members of the Class of the Settlement, their right to object to the Settlement and their right to appear at the Fairness Hearing; (ii) were reasonable and constituted due, adequate, and sufficient notice to all persons entitled to notice; and (iii) met all applicable requirements of the Federal Rules of Civil Procedure, and any other applicable law;
- (e) Whether Class Counsel has adequately represented the Class for purposes of entering into and implementing the Settlement Agreement;
- (f) Whether the proposed plan of allocation of the net settlement amount is fair, reasonable, and adequate and should be approved by the Court;
- (g) Whether the Settlement has been negotiated at arm’s length by Class Counsel on behalf of the Class, whether Plaintiffs have acted independently, and whether Plaintiffs’ interests are identical to the interests of the Class;
- (h) Whether the application for attorneys’ fees and expenses to be filed by Class Counsel should be approved;

- (i) Whether enhancement awards should be awarded as set forth in the Settlement Agreement; and
- (j) Any other issues necessary for approval of the Settlement.

**Class Notice.** The Parties have presented to the Court a proposed Class Notice which is appended to the Assented-To Motion as Exhibit C. The Court **APPROVES** the form and content of the Class Notice finding that it fairly and adequately: (1) describes the terms and effect of the Settlement Agreement and Settlement; (2) gives notice to the Class of the time and place of the Fairness Hearing; and (3) describes how the recipients of the Class Notice may object to approval of the Settlement. The Parties have proposed the following manner of communicating the notice to members of the Class, and the Court finds that such proposed manner is adequate, and directs that Plaintiffs shall:

- (a) By no later than 30 days after entry of this Order, cause the Class Notice, with such non-substantive modifications thereto as may be agreed upon by the Parties, to be disseminated to the last known address of each member of the Class for whom an address is available to Class Counsel.
- (b) By no later than 30 days after entry of this Order, cause the Class Notice, with such non-substantive modifications thereto as may be agreed upon by the Parties, to be disseminated to the last known e-mail address and mobile telephone number of each member of the Class whom such contact information is available to Class Counsel.
- (c) By no later than 30 days after entry of this Order, cause the Class Notice, with such non-substantive modifications thereto as may be agreed upon by the Parties, to be electronically published on a website maintained by Class Counsel.
- (d) By no later than 30 days after entry of this Order, cause advertisements regarding the availability of the website and Notice to be disseminated by social and broadcast media as proposed in the Assented-To Motion.

At or before the Fairness Hearing, Class Counsel shall file with the Court a proof of

timely compliance with the foregoing mailing and publication requirements.

**Objections to Settlement.** “Objector” shall mean any member of the Class who wishes to object to the fairness, reasonableness or adequacy of the Settlement, to the plan of allocation, to any term of the Settlement Agreement, to the proposed enhancement awards, or to the proposed award of attorney fees and expenses. Any Objector must file with Class Counsel a statement of his, her, or its objection(s), which must include the following: (a) their full name, address, email address, and telephone number, (b) the approximate dates of their relationship with Defendants, (c) a written statement of all grounds for the objection, (d) copies of any papers, briefs, or other documents upon which the objection is based (if applicable), (e) a statement of whether they intend to appear at the Fairness Hearing, and (f) their signature, even if represented by counsel. The address for filing objections with Class Counsel is as follows:

Hillary Schwab, Esq. Osvaldo Vazquez, Esq. FAIR WORK, P.C. 192 South Street, Suite 450 Boston, MA 02111 Tel: (617) 299-8192 Fax: (617) 488-2261 Email: <a href="mailto:class.admin@fairworklaw.com">class.admin@fairworklaw.com</a>	Keally Cieslik, Esq. Thomas L. Smith, Esq. JUSTICE AT WORK 33 Harrison Avenue, Suite 501 Boston, MA 02111 Tel. (617) 865-8419 Fax: (617) 995-0910
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Class counsel will submit with the motion for Final Approval, any timely objections or exclusion statements they have received.

The Objector, or, if represented by counsel, his, her, or its counsel, must effect service of the objection on Class Counsel listed above no later than sixty (60) days from

the date Notice is issued. Any member of the Class or other person who does not timely file and serve a written objection complying with the terms of this paragraph shall be deemed to have waived, and shall be foreclosed from raising, any objection to the Settlement and any untimely objection shall be barred.

**Appearance at Fairness Hearing.** An Objector who files and serves a timely, written objection in accordance with the paragraph above may also appear at the Fairness Hearing either in person or through counsel retained at the Objector's expense. Objectors or their attorneys intending to appear at the Fairness Hearing must indicate their intention to do so in the objection filed with Class Counsel. The objection must also state the identity of all attorneys representing them who will appear at the Fairness Hearing. Any Objector who does not timely file an objection in accordance with this paragraph shall not be permitted to appear at the Fairness Hearing, except for good cause shown. Class counsel shall furnish defense counsel with copies of all objections by no later than five (5) days after receipt of such objection.

**Compliance with Class Action Fairness Act.** Defendants shall, on or before ten (10) calendar days prior to the Fairness Hearing, file with the Court proof of compliance with the Class Action Fairness Act of 2005, as specified in [28 U.S.C. § 1715](#) and paragraph 2 of the Stipulation.

**Notice Expenses.** Reasonable expenses of effectuating Class Notice shall be paid out of the settlement fund.

**Application for Attorneys' Fees.** Any application by Class Counsel for attorneys' fees and reimbursement of expenses, including expenses related to administering the

Settlement, and all papers in support thereof, shall be filed with the Court and served on all counsel of record at least twenty-eight (28) calendar days prior to the Fairness Hearing.

**Motion for Final Approval of Settlement and Plan of Allocation.** Class Counsel shall file with the Court a motion for entry of the Final Approval Order at least seven (7) calendar days prior to the Fairness Hearing.

**Termination of Settlement.** If the Settlement is does not become Final for any reason, this Order and all class findings shall become null and void, and shall be without prejudice to the rights of the Parties, all of whom shall be restored to their respective positions existing immediately before this Court entered this Order.

**Continuance of Hearing.** The Court reserves the right to continue the Fairness Hearing without further written notice.

ENTERED this 2nd day of February 2026.

/s/ Leo T. Sorokin

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The Honorable Leo T. Sorokin  
United States District Judge