

HEARING DATE: August 22, 2025 at 9:00 a.m.

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

**CHRISTOPHER HOPKINS and CRAIG METCALF**, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

**ALADDIN FOOD MANAGEMENT SERVICES, LLC**, a Foreign Limited Liability Company; **ELIOR, INC.**, a Foreign Profit Corporation; and **DOES 1-10**, inclusive,

Defendants.

Case No. 25-2-07342-0

**[PROPOSED] ORDER:**

- (1) **GRANTING CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS AND PRELIMINARY APPROVAL OF SETTLEMENT;**
- (2) **APPROVING NOTICE AND RELATED MATERIALS;**
- (3) **APPOINTING SETTLEMENT ADMINISTRATOR; AND**
- (4) **SCHEDULING FINAL APPROVAL HEARING**

[PROPOSED] ORDER

ACKERMANN & TILAJEF, P.C.  
2602 N. PROCTOR ST., STE. 205  
TACOMA, WASHINGTON 98406  
P: (253) 625-7720 F: (310) 277-0635

1 The motion filed by Plaintiffs Christopher Hopkins and Craig Metcalf ("Plaintiffs") on  
2 behalf of themselves and all others similarly situated, for preliminary approval of their class action  
3 settlement with Defendants Aladdin Food Management Services, LLC; Elixor, Inc.; and  
4 subsidiaries and affiliated companies ("Defendants"), seeking conditional certification of a  
5 Settlement Class in this action, preliminary approval of the Parties' proposed Settlement, approval  
6 of the notice plan and the notice to be sent to Settlement Class Members about the Settlement, and  
7 the setting of a date for the hearing on final approval of the Settlement, came before the Court for  
8 consideration. The Court, having read and considered the papers on the motion, the arguments of  
9 counsel, and the law, and good cause appearing therefore,

10 **IT IS SO ORDERED:**

11 1. The following class of persons is certified as the Settlement Class in this action  
12 solely for the purposes of the Settlement:

13 Plaintiffs and all individuals who, from January 1, 2023, through June 12, 2025 (the  
14 "Settlement Class Period"), applied for a job opening in the State of Washington with  
15 Defendants, where the job posting did not disclose the wage scale or salary range for  
16 the position, or a general description of all of the benefits and other compensation to  
17 be offered to the hired applicant.

18 2. The proposed Settlement Class satisfies the requirements of a settlement class  
19 because the Settlement Class Members are readily ascertainable, and a well-defined community  
20 of interest exists in the questions of law and fact affecting the Parties. The Settlement Class  
21 includes approximately 1,261 individuals.

22 3. The Parties' Class Action Settlement Agreement (the "Settlement" or "S.A.")  
23 (Decl. of Craig J. Ackermann in Support of Preliminary Approval, **Exhibit 1**) is granted  
24 preliminary approval as it meets the criteria for preliminary settlement approval. This Order  
25 incorporates by reference the definitions and terms in the Settlement. The Court finds that, given  
26 the benefits provided to the Settlement Class, the potential defenses raised by Defendants, and the  
27 range of other comparable settlements that have received preliminary and final approval by other  
Washington state and federal courts, the Settlement falls within the range of possible final approval

[PROPOSED] ORDER

ACKERMANN & TILAJEF, P.C.  
2602 N. PROCTOR ST., STE. 205  
TACOMA, WASHINGTON 98406  
P: (253) 625-7720 F: (310) 277-0635

as fair, adequate and reasonable, was the product of arm's-length and informed negotiations between the Parties, and appears to treat all Settlement Class Members fairly.

4. The Parties' proposed Notice plan is constitutionally sound because individual Notices and Claim Forms will be mailed and/or emailed to all Settlement Class Members whose identities are known to the Parties. The Notices and Claim Forms will be disseminated according to the notice procedure described in the Settlement and substantially in the form submitted by the Parties. To ensure that the Notices and Claim Forms reach as many Settlement Class Members as possible, the Settlement Administrator will take the class data provided by the Parties (which will include each Settlement Class Member's full name, last-known address, last known telephone number, and last known email address, to the extent this information is known and reasonably accessible in Defendants' records), and update the addresses using the National Change of Address database. After doing so, the Settlement Administrator will mail via first-class mail and/or email the Notices and Claim Forms. If any of the Notices and Claim Forms are returned as undeliverable (i.e., if there is no forwarding address), the Settlement Administrator will perform "skip trace" address searches and will re-mail Notices and Claim Forms to Settlement Class Members for whom new addresses are provided or are found. Proof of distribution of the Notices and Claim Forms will be filed by the Parties at or prior to the final approval hearing. The Parties' proposed Class Notice (Settlement Agreement, **Exhibit A**) is sufficient to inform Settlement Class Members of the terms of the Settlement, their rights under the Settlement (including, but not limited to, their right to participate in the Settlement and receive a share of the Net Settlement Fund by submitting a valid and timely Claim Form, their right to object to the Settlement, and their right to request to be excluded from the Settlement), and the date and location of the final approval hearing. The Notice further advises Settlement Class Members that, if they do not elect to exclude themselves from the Settlement, and if they submit a timely and valid Claim Form, they will receive their equal share of the Net Settlement Fund as a Settlement Claimant and will be bound by the release

of claims in the Settlement Agreement<sup>1</sup> with respect to Defendants and the Released Parties<sup>2</sup>. Further, the Notice advises Settlement Class Members that, if they do not exclude themselves from the Settlement, and if they do not submit a timely and valid Claim Form, they will not receive a share of the Net Settlement Fund and will still be bound by the release of claims in the Settlement Agreement with respect to Defendants and the Released Parties. The Notice plan provides the best notice practicable and, therefore, is approved.

5. Any Settlement Class Member who does not request exclusion from the Settlement and seeks to be eligible to receive a share of the Net Settlement Fund has until 60 days after the mailing and emailing of the Notice to submit a Claim Form, pursuant to the procedures set forth in the Notice.

6. Any Settlement Class Member who does not request exclusion from the Settlement and who wishes to object to the Settlement, including to Class Counsel's requested attorneys' fees and/or litigation costs, has until 60 days after the mailing and emailing of the Notice to submit a written objection, pursuant to the procedures set forth in the Notice.

7. Any Settlement Class Member may opt-out of the Settlement by submitting a written request for exclusion from the Settlement no later than 60 days after the mailing and emailing of the Notice, pursuant to the procedures set forth in the Notice. Any Settlement Class Member who requests exclusion from the settlement does not have a right to object to the Settlement or to submit a Claim Form.

8. Any Settlement Class Member who does not timely submit a written objection that complies with the requirements in the Notice shall not be permitted to object or appear at the final

<sup>1</sup> The Settlement Class Members' Release is defined as, "all claims that were alleged or could have been alleged in the Actions during the Settlement Class Period based on the same factual predicates as alleged therein, including claims under any federal, state, or local law. These Released Claims specifically include, but are not limited to, any claims arising out of or relating to a violation of RCW 49.58.110, and any claims for relief under RCW 49.58.060 or RCW 49.58.070, actual damages, statutory damages, interest, and attorneys' fees and costs relating to any of the foregoing." See S.A., ¶ 18(b).

<sup>2</sup> The Released Parties are: "(i) Defendants and their parents, subsidiaries, affiliates, insurers, insurance policies and benefit plans, (ii) each of the past and present officers, directors, agents, employees, equity holders (shareholders, holders of membership interests, etc.), representatives, administrators, fiduciaries and attorneys of the entities and plans described in this sentence, and (iii) the predecessors, successors, transferees, and assigns of each of the persons and entities described in this sentence." See S.A., ¶ 18(c).

1 approval hearing, shall be deemed to have waived any objection at the final approval hearing, and  
2 shall be bound by all proceedings, orders, and judgments of the Court. Any Settlement Class  
3 Member who wishes to be heard orally at the final approval hearing, either personally or through  
4 an attorney, must so state explicitly in the Settlement Class Member's written objection as  
5 described in the Notice, or the Settlement Class Member will not be heard orally. Any objection  
6 that is not timely made shall be forever barred. Any attorney hired by a Settlement Class Member  
7 at that Settlement Class Member's expense for the purpose of making objections must file with  
8 the Clerk of the Court, and serve the Parties' counsel, a notice of appearance within 60 days of the  
9 date of the Notice.

10 9. The Court makes the following appointments: (1) Plaintiffs Christopher Hopkins  
11 and Craig Metcalf as the Settlement Class Representatives; (2) Craig Ackermann, Brian Denlinger,  
12 and Avi Kreitenberg of Ackermann & Tilajef, P.C. as Class Counsel; and (3) CPT Group, Inc. as  
13 Settlement Administrator.

14 10. Defendants are directed to provide the Settlement Administrator with the  
15 Settlement Class List, as specified by paragraph 13 of the Settlement, no later than 14 calendar  
16 days after the date of this Order.

17 11. The Settlement Administrator is directed to mail the approved Notice and Claim  
18 Form by first-class regular U.S. mail and by email, to the extent this information is available, to  
19 the Settlement Class Members no later than 14 calendar days after receipt of the Settlement Class  
20 List from Defendant, as specified by paragraph 14 of the Settlement.

21 12. The Settlement Administrator is directed to email Supplemental Notices, to the  
22 extent this information is available, to Settlement Class Members who have not submitted a Claim  
23 Form or requested exclusion from the Settlement, as specified by paragraph 14 of the Settlement.

24 13. A final approval hearing will be held on **January 16, 2026 at 9:00** [at least  
25 **150 days after entry of this Order**] to determine whether the Settlement should be granted final  
26 approval as fair, reasonable, and adequate. The Court will hear all evidence and argument  
27 necessary to evaluate the Settlement and will consider the Settlement Class Representatives'

[PROPOSED] ORDER

ACKERMANN & TILAJEF, P.C.  
2602 N. PROCTOR ST., STE. 205  
TACOMA, WASHINGTON 98406  
P: (253) 625-7720 F: (310) 277-0635

8/27/2025 4558 0101

1 request for their Service Awards and Class Counsel's request for attorneys' fees and  
2 reimbursement of litigation costs. Settlement Class Members and their counsel may oppose the  
3 Settlement and/or the motion for an award of the Service Awards and the Class Counsel attorneys'  
4 fees and reimbursement of litigation costs, if they so desire, as set forth in the Notice.

5 14. Plaintiffs' motion in support of final approval, including any request for the Class  
6 Counsel attorneys' fees and litigation costs payments, must be filed no later than 7 Court days  
7 before the final approval hearing. Any Settlement Class Member may appear at the final approval  
8 hearing in person or by his or her own attorney and show cause why the Court should not approve  
9 the Settlement, or object to the motion for the award of the Service Awards and/or Class Counsel's  
10 requested attorneys' fees and litigation costs, pursuant to the procedures set forth in the Notice.

11 15. Pending final determination of whether the Settlement should be approved,  
12 Plaintiffs, all Settlement Class Members, and any person or entity allegedly acting on behalf of  
13 Settlement Class Members, either directly, representatively or in any other capacity, are  
14 preliminarily enjoined from commencing or prosecuting against Defendants any action or  
15 proceeding in any court or other forum asserting any of the Released Class Claims. This injunction  
16 is necessary to protect and effectuate the Settlement, this Order, and the Court's flexibility and  
17 authority to enter judgment when appropriate and is ordered in aid of the Court's jurisdiction and  
18 to protect its judgments.

19 16. If final approval of the Settlement is not granted, the Parties shall be returned to the  
20 status quo ex ante, for all litigation purposes, as if no settlement had been negotiated or entered  
21 into; and thus, this Order and all other findings or stipulations regarding the Settlement shall be  
22 automatically void, vacated, and treated as if it was never filed.

23 17. Counsel for the Parties are hereby authorized to utilize all reasonable procedures in  
24 connection with the administration of the Settlement which are not materially inconsistent with  
25 either this Order or the terms of the Settlement.

26 18. The Court reserves the right to continue the date of the final approval hearing  
27 without further notice to Settlement Class Members. The Court may approve or modify the

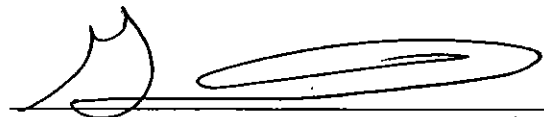
[PROPOSED] ORDER

ACKERMANN & TILAJEF, P.C.  
2602 N. PROCTOR ST., STE. 205  
TACOMA, WASHINGTON 98406  
P: (253) 625-7720 F: (310) 277-0635

Settlement without further notice to Settlement Class Members. The Court retains jurisdiction to consider all further matters arising out of or in connection with the Settlement. This Action is stayed until further ordered by this Court, except such actions and proceedings that may be necessary to implement the Settlement and this Order.

**IT IS SO ORDERED.**

DATED: 8/20/25



HONORABLE JUDGE GRANT BLINN  
SUPERIOR COURT JUDGE OF PIERCE COUNTY

Presented by:

ACKERMANN & TILAJEF, P.C.

/s/Craig J. Ackermann

Craig Ackermann, WSBA #53330

Brian W. Denlinger, WSBA #53177

Avi Kreitenberg, WSBA #53294

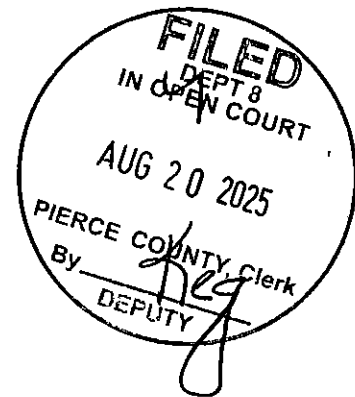
*Counsel for Plaintiffs and the Settlement Class*

JACKSON LEWIS P.C.

/s/Brian K. Keeley

Brian K. Keeley, WSBA #32121

*Counsel for Defendants*



[PROPOSED] ORDER

ACKERMANN & TILAJEF, P.C.  
2602 N. PROCTOR ST., STE. 205  
TACOMA, WASHINGTON 98406  
P: (253) 625-7720 F: (310) 277-0635