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DEC 05 2025 11:52

Scott G. Weber, Clerk, Clark Co.

THE HONORABLE GREGORY M. GONZALES
NOTING DATE: December 5, 2025 at 9:00 am
Moving Party

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK**

PEJMAN BOZORGMEHRI, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

ADDUS HEALTHCARE, INC., a Foreign
Profit Corporation, and **DOES 1-10**, inclusive,

Defendants.

Case No. 25-2-02433-06

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

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TACOMA, WASHINGTON 98406
P: (253) 625-7720 F: (310) 277-1111

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2 The motion filed by Plaintiff Pejman Bozorgmehri ("Plaintiff") on behalf of himself and
3 all others similarly situated, for preliminary approval of his class action settlement with Defendant
4 Addus Healthcare, Inc. ("Defendant"), seeking conditional certification of a Settlement Class in
5 this action, preliminary approval of the Parties' proposed Settlement, approval of the notice plan
6 and the notice to be sent to Settlement Class Members about the Settlement, and the setting of a
7 date for the hearing on final approval of the Settlement, came before the Court for consideration.
8 The Court, having read and considered the papers on the motion, the arguments of counsel, and
9 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 Plaintiff and all individuals who, from January 1, 2023, through September 4, 2025 (the
14 "Settlement Class Period"), applied for job opening for a specific available position
15 (i.e., not an "evergreen" position) in the State of Washington with Defendant, where
16 the job posting did not disclose the wage scale or salary range for the position, or a
general description of all of the benefits and other compensation to be offered to the
hired applicant.

17 2. The proposed Settlement Class satisfies the requirements of a settlement class
18 because the Settlement Class Members are readily ascertainable, and a well-defined community
19 of interest exists in the questions of law and fact affecting the Parties. The Settlement Class
20 includes approximately 210 individuals.

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

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

3 4. The Parties' proposed Notice plan is constitutionally sound because individual
4 Notices and Claim Forms will be mailed and/or emailed to all Settlement Class Members whose
5 identities are known to the Parties. The Notices and Claim Forms will be disseminated according
6 to the notice procedure described in the Settlement and substantially in the form submitted by the
7 Parties. To ensure that the Notices and Claim Forms reach as many Settlement Class Members as
8 possible, the Settlement Administrator will take the class data provided by the Parties (which will
9 include each Settlement Class Member's full name, last-known address, last known telephone
10 number, and last known email address, to the extent this information is known and reasonably
11 accessible in Defendant's records), and update the addresses using the National Change of Address
12 database. After doing so, the Settlement Administrator will mail via first-class mail and/or email
13 the Notices and Claim Forms. If any of the Notices and Claim Forms are returned as undeliverable
14 (i.e., if there is no forwarding address), the Settlement Administrator will perform "skip trace"
15 address searches and will re-mail Notices and Claim Forms to Settlement Class Members for
16 whom new addresses are provided or are found. Proof of distribution of the Notices and Claim
17 Forms will be filed by the Parties at or prior to the final approval hearing. The Parties' proposed
18 Class Notice (Settlement Agreement, **Exhibit A**) is sufficient to inform Settlement Class Members
19 of the terms of the Settlement, their rights under the Settlement (including, but not limited to, their
20 right to participate in the Settlement and receive a share of the Net Settlement Fund by submitting
21 a valid and timely Claim Form, their right to object to the Settlement, and their right to request to
22 be excluded from the Settlement), and the date and location of the final approval hearing. The
23 Notice further advises Settlement Class Members that, if they do not elect to exclude themselves
24 from the Settlement, and if they submit a timely and valid Claim Form, they will receive their
25 equal share of the Net Settlement Fund as a Settlement Claimant and will be bound by the release
26
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1 of claims in the Settlement Agreement¹ with respect to Defendant and the Released Parties².
2 Further, the Notice advises Settlement Class Members that, if they do not exclude themselves from
3 the Settlement, and if they do not submit a timely and valid Claim Form, they will not receive a
4 share of the Net Settlement Fund and will still be bound by the release of claims in the Settlement
5 Agreement with respect to Defendant and the Released Parties. The Notice plan provides the best
6 notice practicable and, therefore, is approved.

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

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

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

20 8. Any Settlement Class Member who does not timely submit a written objection that
21 complies with the requirements in the Notice shall not be permitted to object or appear at the final
22

23 ¹ The Settlement Class Members' Release is defined as, "all claims that were alleged or could have been alleged in
24 the Action during the Settlement Class Period based on the same factual predicates as alleged therein, including claims
25 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
26 49.58.070, actual damages, statutory damages, interest, and attorneys' fees and costs relating to any of the foregoing."
27 See S.A., ¶ 18(b).

² The Released Parties are: "(i) Defendant and its parents, subsidiaries, affiliates, insurers, reinsurers, 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) Plaintiff Pejman Bozorgmehri as
11 the Settlement Class Representative; (2) Craig Ackermann, Brian Denlinger, Avi Kreitenberg, and
12 Amanda Lutsock of Ackermann & Tilajef, P.C. as Class Counsel; and (3) CPT Group, Inc. as
13 Settlement Administrator.

14 10. Defendant is directed to provide the Settlement Administrator with the Settlement
15 Class List, as specified by paragraph 13 of the Settlement, no later than 14 calendar days after the
16 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 ~~April~~ ^{May 22} ~~2026~~ ²⁰²⁵ at ~~9~~ ^{9:00} a.m. to
25 determine whether the Settlement should be granted final approval as fair, reasonable, and
26 adequate. The Court will hear all evidence and argument necessary to evaluate the Settlement and
27 will consider the Settlement Class Representative's request for his Settlement Class Representative

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

5 14. Plaintiff's 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 Settlement Class Representative Service
10 Award and/or Class Counsel's requested attorneys' fees and litigation costs, pursuant to the
11 procedures set forth in the Notice.

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

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

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

27 18. The Court reserves the right to continue the date of the final approval hearing

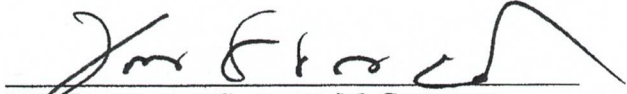
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1 without further notice to Settlement Class Members. The Court may approve or modify the
2 Settlement without further notice to Settlement Class Members. The Court retains jurisdiction to
3 consider all further matters arising out of or in connection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

6 **IT IS SO ORDERED.**

7
8 DATED: 12/5/25


9 THE HONORABLE GREGORY M. GONZALES
10 SUPERIOR COURT JUDGE OF CLARK COUNTY

11 Presented by:

12 ACKERMANN & TILAJEF, P.C.

13 /s/Brian W. Denlinger
14 Brian W. Denlinger, WSBA #53177
15 *Counsel for Plaintiff and the Settlement Class*

16 Approved as to Form, Notice of Presentation Waived:

17 JACKSON LEWIS P.C.

18 /s/Brian K. Keeley
19 Brian K. Keeley, WSBA #32121
20 *Counsel for Defendant*

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