

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT

PLYMOUTH COUNTY

RUSSELL LOPES, on behalf of himself
And all others similarly situated,

Plaintiff,

Civil Action No. 2013-01350-A

v.

CITY OF BROCKTON

~~PROPOSED~~ ORDER OF PRELIMINARY APPROVAL
OF SETTLEMENT

This matter came on for hearing on June 29, 2020, following the Parties' Joint Motion for Preliminary Approval of Settlement (the "Motion for Preliminary Approval"). Following a hearing on the Motion for Preliminary Approval, and the Court having considered all papers filed and proceedings had herein, and having reviewed the record in the above captioned matter,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED AS FOLLOWS:

1. Unless otherwise provided herein, capitalized terms used in this Order shall have the same meaning as defined in the Stipulation of Settlement attached to the Motion for Preliminary Approval as Exhibit B (the "Stipulation").
2. The Court finds on a preliminary basis that the "Settlement" memorialized in the Stipulation falls within the range of reasonableness and otherwise meets the requirements for preliminary approval.

3. The Court orders that the "Settlement Class" shall be all qualified, non-White applicants to the Department of Public Works for the City of Brocton from October 10, 2010 through December 18, 2019.

4. The Court appoints Russell Lopes as "Class Representative" and Gordon Law Group, LLP as "Class Counsel."

5. The Court appoints RG/2 Claims Administration as "Claims Administrator."

6. The Court approves the appointment of a person mutually agreeable to the parties, as "Adjudicator."

7. The Court approves the content and proposed distribution of the Notice of Proposed Class Action Settlement and Claim Form (the "Notice Packet," attached as Exhibits A and B to the Stipulation) set forth in the Stipulation.

8. The Court orders the following dates for further proceedings:

a. Settlement Administrator shall mail the appropriate Notices to all Class Members within 30 days after entry of this Order, with additional notices as provided in the Stipulation.

b. Any objection to the settlement made by any Settlement Class Member shall be mailed to the Settlement Administrator within 75 days following the initial mailing of the Notices by the Settlement Administrator.

c. The Court will conduct a hearing on the Motion for Final Approval on Dec. 8, 2020 (not less than 180 days after entry of this Order), to determine the overall fairness of the Settlement.

For the foregoing reasons, it is SO ORDERED.

Dated: 6/29, 2020

Debra Lewis Lee
Justice of the Superior Court