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16 *Settlement Class*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

15 SEDRE WRIGHT, MEGAN KOESTER,
16 JUANITA MEDINA, LASEAN TARDD,
17 ADRINE AKOPYAN, and ALISA SMITH,
18 individually and on behalf of all other
19 similarly situated individuals,

20 Plaintiffs,

21 v.

22 CROSSROADS TRADING CO., INC.,

23 Defendant.

Filed
June 15, 2026
Clerk of the Court
Superior Court of CA
County of Santa Clara
25CV479119
By: afloresca

6/15/2026 4:37:10 PM


Case No. 25CV479119

**~~PROPOSED~~ ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Judge: Hon. Theodore C. Zayner
Complaint Filed: October 31, 2025
Trial Date: Not Set.

1 The Court, having considered Plaintiffs’ Motion for Preliminary Approval of Class Action
2 Settlement filed on December 12, 2025 (the “Motion”), the memorandum of points and authorities
3 and declaration of John J. Nelson filed in support, along with the pleadings filed to date in this
4 matter including Defendant Crossroads Trading Co., Inc.’s Notice of Non-Opposition to the
5 Motion, and good cause having been found, issued a Tentative Ruling on May 13, 2026 Granting
6 Plaintiffs’ Motion (the “Tentative”). No party contested the Court’s Tentative within the time
7 specified by California Rules of Court, Rule 3.1308, and therefore the Tentative is adopted and
8 becomes the final ruling of this Court.

9 Accordingly, and consistent with the Tentative, the Court hereby rules as follows:

10 1. The proposed Settlement Agreement between Plaintiffs and Defendant Crossroads
11 Trading Co. Inc. (“Defendant”), including its recovery amount, payment structure and proposed
12 release, is fair, adequate, and reasonable within the context of California Rules of Court, Rule
13 3.769. Therefore, Plaintiffs’ Motion for Preliminary Approval of the Class Action Settlement is
14 hereby **GRANTED**.

15 2. The Court preliminarily finds that there are common questions regarding the
16 whether class members were subjected to unlawful conduct sufficient to satisfy the requirements
17 of California Code of Civil Procedure, Section 382 and conditionally certifies the following class
18 for settlement purposes only¹:

19 All individuals residing in the United States whose Private Information may have
20 been compromised or otherwise impacted in the Data Security Incident involving
21 Crossroads Trading Company, Inc., including all those who received notice of the
22 breach.

22 Excluded from the Settlement Class are: (1) the Judge(s) presiding over the State Court
23 Lawsuit and members of their immediate families and their staff; (2) Crossroads and its
24

25 ¹ In the event that the Court does not grant final approval of the Settlement or if the Settlement is
26 terminated or cancelled, then the Settlement, and the conditional certification of the Settlement
27 Class for settlement purposes, will be vacated and the litigation shall proceed as though the
28 Settlement Class had never been conditionally certified with no admission of liability or merit as
to any issue, and no prejudice or impact as to any of the Settling Parties’ positions on the issue of
class certification or any other issue in the case.

1 subsidiaries, parent companies, successors, predecessors, and any Entity in which Crossroads, has
2 a controlling interest; (3) natural persons who properly execute and submit a request to opt out
3 prior to the expiration of the Opt-Out Period; and (4) the successors or assigns of any such
4 excluded natural person.

5 3. The following named plaintiffs are hereby appointed Representative Plaintiffs for
6 the Settlement Class: Sedre Wright, Megan Koester, Juanita Medina, LaSean Tardd, Adrine
7 Akopyan, and Alisa Smith. According to their briefing, Plaintiffs will seek service awards of up
8 to \$2,500 each. The Court is inclined to find that the requested service awards are justified and
9 reasonable, and it will issue its final determination regarding the approved amount in connection
10 with final approval of the settlement.

11 4. Milberg, PLLC is hereby appointed as Settlement Class Counsel. According to
12 their briefing, Class counsel will seek attorney fees of up to one-third of the gross settlement
13 amount (i.e., up to \$200,000). Prior to the final approval hearing, class counsel shall submit
14 lodestar information (including hourly rate and hours worked) as well as evidence of actual
15 litigation costs incurred and settlement administration costs, in support of their request for
16 attorney fees.

17 5. Kroll Settlement Administration, LLC is hereby appointed as the Settlement
18 Administrator and is authorized to carry out the responsibilities as set forth in the Settlement
19 Agreement, including the commencement of a Notice Plan following entry of this Order in
20 accordance with Section 6 of the Settlement Agreement in accordance with California Rule of
21 Court, Rule 3.771(b). Within 14 days of the entry of this Order, the Settlement Administrator
22 shall create and launch a settlement website pursuant to ¶ 6.7 of the Settlement Agreement.

23 6. The Court has reviewed and considered the Notice Program set forth in the
24 Settlement Agreement and determines that the plan satisfies the due process requirements of
25 California Rules of Court, Rule 3.769 subsection (f). Additionally, the Court has read and
26 considered the Claim Form, Postcard Notice, and Long Form Notice (attached as Exhibits A-C to
27 the Settlement Agreement) and approves their form and contents on the condition that the
28 following language is added to the notice:

1 Class members may appear at the final approval hearing in person or remotely using
2 the link for Department 19 (Afternoon Session), and should review the remote
appearance instructions beforehand: [https://santaclara.courts.ca.gov/online-](https://santaclara.courts.ca.gov/online-services/remote-hearings)
services/remote-hearings.

3 Class members who wish to appear remotely are encouraged to contact class
4 counsel at least three days before the hearing, if possible, so that potential
5 technology or audibility issues can be avoided or minimized

6 To ensure adequate notice of the settlement to class members, Defendant will provide to
7 the Settlement Administrator a list of the names and contact information of the Settlement Class
8 Members it has in its possession, custody or control within 10 business days of the entry of this
9 order.

10 7. Defendant is hereby ordered to deposit settlement funds in the amount set forth by
11 ¶ 3.1 of the Settlement Agreement into an interest-bearing Settlement Escrow Account, created
12 and administered by the Settlement Administrator, within 10 business days of the entry of this
13 Order. The Settlement Escrow Account shall be held in a Qualified Settlement Fund (as defined
14 in ¶ 3.2 of the Settlement Agreement) and the Settlement Administrator shall maintain control
15 over the Settlement Fund and shall be responsible for all disbursements.

16 8. Pursuant to California Civil Code, Section 384, the non-profit residual recipient of
17 non-allocated settlement funds, if any, shall be the Boys and Girls Clubs of Oakland, California,
18 a 25 U.S.C. § 501(c)(3) non-profit organization. The Court approves of the *cy pres* designation.

19 9. Any person wishing to exclude themselves from the Settlement Class must
20 individually submit a written Request for Exclusion (“Opt-Out”) to the address designated by the
21 Settlement Administrator or through the settlement website on or before the end of the Opt-Out
22 Deadline, which is 60 days after the Notice Date. A valid opt-out request shall be in writing and
23 postmarked, or submitted through the settlement website, on or before the end of the Opt-Out
24 Period and must:

- 25 (1) identify the case (e.g., by writing “*Wright, et al v. Crossroads Trading Co., Inc.*,
26 Santa Clara Superior Court, Case No. 25CV479119”);
- 27 (2) state the name, address, telephone number and unique identifier of the Class
28 Member seeking to opt out;

- 1 (3) be physically signed by the person(s) seeking to opt out; and
- 2 (4) contain a statement to the effect that “I hereby request to opt out from the proposed
- 3 Settlement Class in “*Wright, et al v. Crossroads Trading Co., Inc.*, Santa Clara
- 4 Superior Court, Case No. 25CV479119” or language substantially similar.

5 No mass or class opt-outs shall be permitted. All persons who opt out of the Settlement

6 Class shall not receive any benefits of or be bound by the terms of the Settlement Agreement; all

7 persons falling within the definition of the Settlement Class who do not opt out shall be bound by

8 the terms of the Settlement Agreement and by all proceedings, orders, and judgments in the

9 Litigation.

10 10. Any Settlement Class Member may object to the adequacy of the Settlement by

11 timely submitting either a written objection to the Court or file a notice of intent to appear, and

12 appear, at the Final Approval Hearing and making an oral objection. Any and all written

13 objections must be postmarked or filed in person prior to the objection deadline and shall:

- 14 (a) include the Settlement Class Member’s full name, current mailing address, unique
- 15 identifier of the Settlement Class Member, and telephone number;
- 16 (b) include proof that the Settlement Class Member is a member of the Settlement
- 17 Class (e.g., copy of the Settlement Notice, copy of the original notice of the Data
- 18 Security Incident);
- 19 (c) identify the specific factual and legal grounds for the objection;
- 20 (d) identify all counsel representing the Settlement Class Member, if any;
- 21 (e) include a list, including case name, court, and docket number, of all other cases in
- 22 which the objector and/or the objector’s counsel has filed an objection to any
- 23 proposed class action settlement in the past 5 years;
- 24 (f) contain a statement regarding whether the Settlement Class Member (or counsel
- 25 of his or her choosing) intends to appear at the Final Approval Hearing; and
- 26 (g) the signature of the objector.

27 All objections or notices of intent to appear must be filed in person or postmarked to the

28 Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113

on or before the Objection Deadline, which is sixty (60) days after the Notice Date. Any Settlement Class Member who fails to substantially comply with the requirements above shall waive and forfeit any and all rights he or she may have to appear separately and/or to object to the Settlement Agreement and all proceedings, orders, and judgments in the Litigation.

11. A Final Approval Hearing is set for January 13, 2027 at 1:30 p.m. in Department 19 of the Santa Clara Superior Court located at 191 N. First Street, San Jose, CA 95113. Not later than 14 days prior to the Objection and Opt-Out Deadlines, Plaintiffs shall file their Motion for Attorneys' Fees, Costs and Service Awards; the Motion for Final Approval of Class Action Settlement shall be filed on or before December 23, 2026 (21 days prior to the Final Approval Hearing).

12. The related time periods for events preceding the Final Approval Hearing are as follows:

<u>Event</u>	<u>Timing</u>
Class List Date (Defendant to provide list to Settlement Administrator)	10 Business Days after entry of Order on Preliminary Approval
Deposit of settlement funds into Settlement Escrow Account	10 Business Days after entry of Order on Preliminary Approval
Creation of Settlement Website	14 Days after entry of Order on Preliminary Approval
Class Notice Date	30 Days after Preliminary Approval
Objection Deadline	60 Days after Notice Date
Last Day to Opt-Out	60 Days after Notice Date
Claims Deadline	90 Days after Notice Date
Motion for Attorneys' Fees, Costs, and Service Award	14 Days Prior to Objection and Opt-Out Deadlines
Motion for Final Approval	December 23, 2026 (21 Days Prior to the Final Approval Hearing)
Final Approval Hearing	January 13, 2027 at 1:30 PM

13. All proceedings other than those related to the approval of the Class Settlement

1 Agreement are stayed pending entry of the Final Order and Judgement; any actions brought by
2 the Settlement Class Members concerning the Released Claims are stayed pending the Court's
3 entry of the Final Order and Judgment.

4
5 **IT IS SO ORDERED.**

6
7 Dated: June 15, 2026


Hon. Theodore C. Zayner
Judge, Superior Court of California