

FILED
2026 AUG 28 11:57 AM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 25-2-03238-8 SEA

The Honorable Ken Schubert

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

ALEXANDER FLOYD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

QUADRANT TECHNOLOGIES LLC, a
Washington limited liability company doing
business as QUADRANT TECHNOLOGIES
and QUADRANT RESOURCE LLC; and
DOES 1-20, as yet unknown Washington
entities,

Defendants.

No. 25-2-03238-8 SEA

**ORDER GRANTING PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[CLERK'S ACTION REQUIRED]

THIS MATTER came before the Court on Plaintiff Alexander Floyd's Unopposed Motion for Preliminary Approval of Class Action Settlement ("Unopposed Motion"). The Court considered the Unopposed Motion, the supporting Declaration of Timothy W. Emery, the exhibits therein, and the files and records on file.

The Class Settlement Agreement ("Settlement Agreement"), attached to the Declaration of Timothy W. Emery in Support of the Unopposed Motion as Exhibit 1, provides that the Parties agree to settle on a class-wide basis.

The Court, having considered the papers and arguments submitted in support of the motion, HEREBY ORDERS THE FOLLOWING:

ORDER GRANTING PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT - 1

No. 25-2-03238-8 SEA

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600 Stewart Street, Suite 1100
Seattle, WA 98101
Phone: (206) 442-9106 • Fax: (206) 441-9711

1 1. The Court grants preliminary approval of the settlement based upon the terms set
2 forth in the Settlement Agreement.

3 2. The Parties' settlement is granted preliminary approval as it meets the criteria for
4 preliminary settlement approval, appears to be the product of arm's-length and informed
5 negotiations, and appears to be fair, adequate, and reasonable to the Class.

6 3. The Court approves, as to form, content, and method of delivery of, the Notice of
7 Class Action Settlement ("Notice") and Claim Form attached to the Declaration of Timothy W.
8 Emery as Exhibits 2-3, respectively.

9 4. The Court provisionally certifies the Settlement Class as:

10 Plaintiff and all individuals who, from January 1, 2023, through July
11 26, 2025, applied for a job opening in the State of Washington with
12 Defendant, where the job posting did not disclose a wage scale or
13 salary range, and/or a general description of benefits and other
 compensation to be offered to a hired applicant.

14 5. The Court approves the settlement amount of \$900,000.00 ("Settlement Fund").

15 6. The Court appoints Plaintiff Alexander Floyd as Class Representative. The Court
16 finds that the service award requested is fair and reasonable under the circumstances of this case.
17 Plaintiff is awarded a service award in the amount of \$15,000.00, to be paid from the Settlement
18 Fund.

19 7. The Court appoints Timothy W. Emery, Patrick B. Reddy, and Paul Cipriani of
20 Emery Reddy, PC as Class Counsel. The Court finds that the requested attorneys' fees, costs and
21 expenses of \$225,000.00 were reasonably incurred in pursuit of this action on behalf of Plaintiff
22 and the Class. Class Counsel is awarded \$225,000.00 in attorneys' fees, costs, and expenses, to
23 be paid from the Settlement Fund.

24 8. The Court appoints Simpluris, Inc. as the Settlement Administrator. The costs of
25 settlement administration will be paid from the Settlement Fund, not to exceed \$80,000.00.

26 9. The Court orders the following schedule of dates for further proceedings:
27

EVENT	DATE
Defendant's Counsel to Provide Settlement Administrator and Plaintiff's Counsel with Class List	30 calendar days after Preliminary Approval Order
Settlement Administrator to provide estimated payment amounts to Plaintiff's Counsel and Defendant's Counsel	7 days after Defendant's Counsel provides the Class List to the Settlement Administrator and Plaintiff's Counsel
Distribution of Notice; Start of Notice Period	14 calendar days after Defendant's Counsel provides the Class List to the Settlement Administrator
Settlement Administrator to send Reminder Notice to Settlement Class Members	30 days after start of the Notice Period
End of Notice Period; Deadline for Settlement Class Members to submit a Claim Form, request exclusion from, or object to the settlement	60 days after start of the Notice Period
Settlement Administrator to provide to Plaintiff's Counsel and Defendant's Counsel: (1) report identifying Participating Class Members, exclusions, and objections; and (2) draft declaration regarding Notice	5 days after end of Notice Period
Plaintiff's Counsel to provide Defendant's Counsel with draft of Motion for Final Approval	7 days prior to the deadline to file the Motion for Final Approval
Plaintiff's Counsel to file Motion for Final Approval	9 Court days prior to the Final Approval Hearing
Final Approval Hearing	January 14, 2027 at 1:00 pm
Final Approval Order	TBD
Settlement Administrator to provide estimated settlement payment distributions to Plaintiff's Counsel and Defendant's Counsel	14 calendar days after Final Approval Order

ORDER GRANTING PLAINTIFF'S UNOPPOSED
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CLASS ACTION SETTLEMENT - 3

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Effective Date	31 days after Final Approval (assuming no appeal)
Funding Date	30 days after the Effective Date ("Funding Date")
Disbursement of settlement payments, payment of attorneys' fees & costs, service award, and settlement administration costs	14 calendar days after the Funding Date
Deadline for Participating Class Members to claim settlement payments	180 days after disbursement of settlement payments ("Cashing Deadline")
Unclaimed Funds to be sent by the Settlement Administrator to the State of Washington with the associated name of the Participating Settlement Class Member pursuant to Washington's Unclaimed Property Act; Residual Funds to be disbursed to Legal Foundation of Washington	Within 10 days after Cashing Deadline

10. The current trial date of December 14, 2026, is stricken. Should the Court decline to grant final approval of the settlement, the Parties shall confer and submit a joint request for a new trial date within 10 days of an Order denying final approval.

11. All other proceedings in this action are stayed until further order of the Court, except as may be necessary to implement the settlement or to comply with the terms of the Settlement Agreement. Further, pending the Court's final determination of whether the proposed settlement will be approved, each and every Settlement Class Member is barred and enjoined from instituting, commencing, or continuing to prosecute, directly or indirectly, as an individual or collectively, representatively, derivatively on behalf of them, or in any other capacity of any kind whatsoever, asserting any claims that would be released and discharged upon final approval of the settlement.

12. If the Settlement Agreement and the settlement are not approved in all material

ORDER GRANTING PLAINTIFF'S UNOPPOSED
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CLASS ACTION SETTLEMENT - 4

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1 respects by the Court and all appellate courts to which any appeal or other form of review of such
2 approval may be taken, the Parties may withdraw the motion for preliminary approval of
3 settlement from the Court. In such event, this Order will be vacated and the Settlement Agreement
4 and the settlement shall become null and void and neither the Settlement Agreement, its
5 provisions, the exhibits thereto, nor any of the negotiations, statements, representations, or other
6 information provided by Plaintiff or Defendant in the course of negotiating the Settlement
7 Agreement or any proceedings relating thereto: (i) shall be offered, received in evidence, or
8 otherwise used in this action or in any other action or proceeding for any purpose whatsoever; or
9 (ii) shall prejudice the rights of any of the parties hereto, who shall be restored to their respective
10 positions immediately prior to the date of execution of the Settlement Agreement. Further, in such
11 event, this action shall revert to its status immediately prior to the date of execution of the
12 Settlement Agreement and shall proceed as if the Settlement Agreement and all related orders and
13 papers had not been executed or otherwise agreed to.

14 13. Neither the settlement nor the Settlement Agreement should be interpreted as an
15 admission of any liability or wrongdoing by Defendant, or as an admission of the strength or
16 weakness of the claims against Defendant. Neither Defendant's agreement to the Settlement
17 Agreement, nor Defendant's stipulations or other actions, nor any failure to act, shall be used by
18 any Settlement Class member in any other proceeding to argue that any class action should be
19 certified against Defendant.

20 THE COURT HEREBY SETS THE FINAL APPROVAL HEARING AT THE
21 FOLLOWING DATE AND TIME: January 14, 2027 at 1:00 pm. The parties may appear
22 remotely using this Zoom link: <https://kingcounty.zoom.us/j/85190398101>.

23 DATED this 28th day of August, 2026.

24 *E-signature on last page.* _____

25 JUDGE KEN SCHUBERT

1 Presented by:

2 EMERY REDDY, PC

3 By: s/ Timothy W. Emery

4 Timothy W. Emery, WSBA No. 34078

5 Patrick B. Reddy, WSBA No. 34092

6 Paul Cipriani, WSBA No. 59991

7 600 Stewart Street, Suite 1100

8 Seattle, WA 98101

9 Phone: (206) 442-9106

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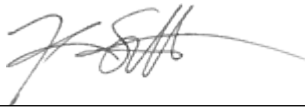
12 Email: reddyp@emeryreddy.com

13 Email: paul@emeryreddy.com

14 *Attorneys for Plaintiff and the Class*

**King County Superior Court
Judicial Electronic Signature Page**

Case Number: 25-2-03238-8 SEA
Case Title: FLOYD VS QUADRANT TECHNOLOGIES LLC DBA
Document Title: Order Granting Motion / Petition
Date Signed: 08/28/2026

A handwritten signature in black ink, appearing to read 'K Schubert', is positioned above a horizontal line.

Judge: Ken Schubert

Key/ID Number: *408452315*
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