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

LAWRENCE HILL, ADAM WISE, and  
ROBERT MILLER, on their own behalves  
and on behalf of all persons similarly  
situated,

Plaintiffs,

v.

GARDA CL NORTHWEST, INC., f/k/a AT  
SYSTEMS, INC. a Washington  
Corporation,

Defendant.

No. 09-2-07360-1 SEA

~~PROPOSED~~ JUDGMENT

**CLERK'S ACTION REQUIRED**

JUDGMENT SUMMARY

1. Judgment creditors: LAWRENCE HILL, ADAM WISE, ROBERT MILLER, and members of the class;
2. Judgment debtor: GARDA CL NORTHWEST, INC.
3. Total judgment, comprised of the amounts set forth in paragraphs 4-6 below: \$ 8,406,620.89
4. Total aggregate back pay damages for plaintiffs and members of the class: \$ 4,209,596.61
5. Total aggregate prejudgment interest for plaintiffs and members of the class through November 6, 2015: \$ 2,528,788.66

~~PROPOSED~~ JUDGMENT  
~~PROPOSED~~ JUDGMENT - 1

SCHROETER GOLDMARK & BENDER  
810 Third Avenue • Suite 500 • Seattle, WA 98104  
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- 1           6. Total double damages for plaintiffs and members of  
2           the class pursuant to RCW 49.52.070:                           \$ 1,668,235.62
- 3           7. Total attorneys' fees and costs for Plaintiffs and  
4           members of the class:   \$ To be determined<sup>1</sup>
- 5           8. Judgment amount shall bear interest at 12% per annum after entry.
- 6           9. Attorneys for Judgment Creditors:           Daniel F. Johnson  
7   Breskin Johnson Townsend, PLLC  
8   1000 Second Avenue, Suite 3670  
9   Seattle, WA 98104
- 10   Adam Berger  
11   Martin S. Garfinkel  
12   Schroeter Goldmark & Bender  
13   810 Third Avenue, #500  
14   Seattle, WA 98104

12           This matter was tried to the Court without a jury from June 16-18, 2015 and  
13           September 21-22, 2015, before the Hon. Julie Spector. Plaintiffs Lawrence Hill, Adam Wise,  
14           and Robert Miller and the class they represent, were represented by Daniel F. Johnson of  
15           Breskin Johnson Townsend, PLLC, and Adam Berger of Schroeter Goldmark & Bender.  
16           Defendant was represented by Clarence Belnavis and Alex Wheatley of Fisher & Phillips LP.

18           The parties presented evidence, testimony and briefing on legal issues. On October  
19           23, 2015 the Court entered written Findings of Fact and Conclusions of Law. A copy of the  
20           Court's written Findings of Fact and Conclusions of Law is attached to this Judgment as  
21           Exhibit A.

23           Consistent with the Court's Findings of Fact and Conclusions of Law, the Court  
24           enters final judgment in this matter as follows:

25 \_\_\_\_\_  
26 <sup>1</sup> Plaintiffs will submit their petition for fees and costs after entry of judgment. The Court will enter a  
supplemental judgment setting forth attorneys' fees and costs for Plaintiffs and members of the class.

1           1.     The total judgment in favor of the class members and against Defendant is the  
2 amount of \$8,406,620.89. This judgment is comprised of the amounts set forth in paragraphs  
3 2, 3, and 4 below.

4           2.     Plaintiffs and the class members are awarded back pay damages against  
5 Defendant in the total aggregate amount of \$4,209,596.61.

7           3.     Plaintiffs and the class members are awarded prejudgment interest against  
8 Defendant in the total aggregate amount of \$2,528,788.66.

9           4.     Plaintiffs and the class members are awarded double damages against  
10 Defendant pursuant to RCW 49.52.070 in the total aggregate amount of \$1,668,235.62.

11          5.     Plaintiffs and the class members shall be awarded attorneys' fees and costs  
12 against the Defendant in a total aggregate amount to be determined subsequent to entry of  
13 judgment. The award of attorneys' fees and costs may include a percentage of the Judgment  
14 amount set forth herein. The court will enter a supplemental judgment awarding the  
15 attorneys' fees and costs, which will also set forth the allocation of net back pay and interest  
16 damages among the individual class members.  
17

18          6.     Plaintiffs and the class members will receive 12% interest on the amounts set  
19 forth in paragraphs 2 and 4 of this judgment from the date of its entry until said judgment is  
20 satisfied.  
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22                 DATED this 9 day of Nov., 2015.

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25 \_\_\_\_\_  
26 HON. JULIE SPECTOR  
King County Superior Court

1 Presented By:

2 s/Daniel F. Johnson

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15 *Attorneys for Plaintiffs*

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