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LOS ANGELES SUPERIOR COURT

JUL - 9 2012

JOHN A. CLARKE, EXECUTIVE OFFICER

BY CAROL WRIGHT, DEPUTY

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JUL - 5 2012

Dept. 308

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15 CHARLES R. DUNAWAY, and SANDRA  
16 BLACKSHER, individually and on behalf of  
17 other persons similarly situated

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA

19 COUNTY OF LOS ANGELES

20 WALTER LINARES, CHARLES  
21 DUNAWAY, and SANDRA BLACKSHER,  
22 individually and on behalf of other persons  
23 similarly situated,

24 Plaintiff,

25 vs.

26 SECURITAS SECURITY SERVICES USA,  
27 INC.; and DOES 1 through 50,

28 Defendants.

) Case No. BC 416555  
) Consolidated with BC 432135  
)  
) Assigned for All Purposes to  
) Hon. Jane L. Johnson, Dept. 308

) CLASS ACTION

) PLAINTIFFS' [REDACTED] ORDER DEFINING  
) CERTIFIED CLASS

BY FAX

1 **STATEMENT BY PLAINTIFFS**

2 Plaintiffs submit this proposed Order, given that all issues have been resolved concerning the  
3 class definition pursuant to the Court's class certification order of June 14, 2012, in that the parties are  
4 now agreed on the class definition.

5 On the present date, July 5, 2012, Defendant filed a "Status Report and Statement Regarding  
6 Outstanding Issues." It states, at page 2, lines 12 through 19:

7 "[Defendant] SUSA proposes the following definition, which is taken from the language in the  
8 Court's Order [the June 14, class certification order]:

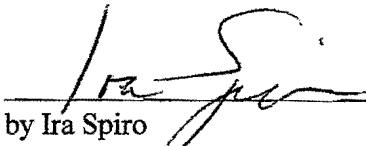
9 "Every person (a) who was employed by Securitas Security Services, USA, Inc. as an  
10 hourly-paid security guard in California during the period beginning June 26, 2005  
11 through the date notice of class certification is sent to the class, and (b) who was  
12 required to report to any Securitas USA branch office, at a time other than during his or  
13 her scheduled shift, for one or more of the following: company initiated meetings,  
14 investigations or inquiries related to an incident at a post, counseling sessions, discipline,  
15 training (except initial orientation training), or receiving notification of suspension or  
16 termination of employment."

17 Plaintiffs stated at oral argument on the motion for class certification that Plaintiffs believe the  
18 definition they proposed in the motion for class certification is proper, and Plaintiffs still believe so.

19 However, the Court has disagreed, and in view of the that, Plaintiffs hereby agree to the  
20 definition proposed by Defendant this date, quoted above at lines 9 through 16:

21 Spiro Moore LLP

22  
23 Dated: July 5, 2012

  
by Ira Spiro  
Attorneys for Plaintiffs

24  
25 [proposed order on next page]

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**ORDER DEFINING CERTIFIED CLASS**

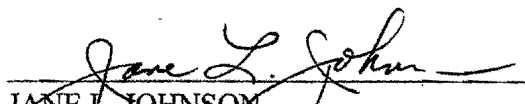
Good cause appeared, IT IS HEREBY ORDERED that the definition of the class certified in this action is as follows (the definition is identical to the definition proposed by Defendant in its "Status Report and Statement Regarding Outstanding Issues," dated July 5, 2012):

*J & J*

"Every person (a) who was employed by Securitas Security Services, USA, Inc. as an hourly-paid security guard in California during the period beginning June 26, 2005 through the date notice of class certification is sent to the class, and (b) who was required to report to any Securitas USA branch office, at a time other than during his or her scheduled shift, <sup>and was not paid</sup> for one or more of the following: company initiated meetings, investigations or inquiries related to an incident at a post, counseling sessions, discipline, training (except initial orientation training), or receiving notification of suspension or termination of employment."

SO ORDERED

Dated: JUL - 9 2012

  
JANE L. JOHNSON  
Judge of the Superior Court

**PROOF OF SERVICE**

*Linares et al. v. Securitas Security Services USA, Inc.*  
LASC Case No. BC 416555

I am over the age of eighteen years and not a party to the within action. My business address is 11377 W. Olympic Blvd., 5<sup>th</sup> Floor, Los Angeles, CA 90064-1683. I am employed at that address at the firm of Spiro Moss LLP.

On the date set forth below I served the document(s) described as **PLAINTIFFS' [proposed] ORDER DEFINING CERTIFIED CLASS** on all the interested parties in this action, by placing: [ ] the original [xx] true copies thereof enclosed in sealed envelopes, addressed as follows, which addresses are the addresses last given by the respective addressees' on any document filed in the above case and served on Spiro Moss LLP:

Thomas P. Brown, IV Sherry Beth Shavit BROWN GITT LAW GROUP, LLP 300 N. Lake Ave., Ste 200 Pasadena, CA 91101 fax. (626) 229-1917 Email: <a href="mailto:tbrown@browngitt.com">tbrown@browngitt.com</a> <a href="mailto:sshavit@browngitt.com">sshavit@browngitt.com</a>	J. Kevin Lilly Sarah M. Milstein Littler Mendelson 2049 Century Park East 5th Floor Los Angeles, LA 90067 <a href="mailto:klilly@littler.com">klilly@littler.com</a>
David Spivak THE SPIVAK LAW FIRM 9454 Wilshire Blvd. Ste. 303 Beverly Hills, CA 90212 fax (310) 499-4739	Louis Benowitz LAW OFFICES OF LOUIS BENOWITZ 9454 Wilshire Blvd. Penthouse, Ste. 34 Beverly Hills, CA 90212 fax (310) 888-0109
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**BY MAIL (Pickup):** I am readily familiar with this firms's practice of collection and processing correspondence for mailing with the United States Postal Service. On the date set forth below, at the firm of Spiro Moss LLP at the above address, I placed the envelope(s) containing said document(s), sealed, for collection and mailing on that date with the United States Postal Service following ordinary business practices. Under the above-mentioned practice of Spiro Moss LLP, the above document(s) would be deposited with the United States Postal Service on that same day in the ordinary course of business, with postage thereon fully prepaid at Los Angeles, California.

1 **[X] BY METHOD OF DELIVERY PROVIDING FOR OVERNIGHT DELIVERY:** On the  
2 date set forth below I deposited such envelope(s) in a box or other facility regularly maintained  
3 by the express service carrier, or delivered such envelope(s) to an authorized courier or driver  
4 authorized by the express service carrier to receive documents, with delivery fees paid or  
provided for. The envelope was an envelope or package designated by the express service  
carrier.

5 **[ ] BY FACSIMILE** On the date set forth below, I transmitted the above document(s) from  
6 facsimile machine number (310) 235-2456, in compliance with transmission as provided in  
7 California Rule of Court 2008. The fax number(s) that I used are shown above or on the  
8 attached Service List, along with the names of recipients and the interested parties. The  
9 Facsimile Machine I used complied with California Rule of Court 2003(3). The transmission  
was reported as complete and without error by the machine, which properly issued the  
transmission report.

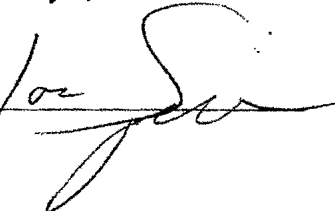
10 **[X] (STATE)** I declare under penalty of perjury under the laws of the State of California that the  
11 above is true and correct.

12 Executed at Los Angeles County, California, on July 5, 2012.

13   
14 \_\_\_\_\_  
Diana Lee

15  
16 **[X] BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted  
17 the document(s) listed above to the above email address(s) before 5:00 p.m.

18 Executed at Los Angeles County, California, on July 5, 2012.

19  
20   
Ira Spiro