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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

IVAN BARON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

HYRECAR INC., JOSEPH FURNARI
and ROBERT SCOTT BROGI,

Defendants.

Case No. 2:21-cv-06918-FWS-JC

Honorable Fred W. Slaughter

**CLASS DISTRIBUTION
ORDER**

Hearing Date: March 6, 2025

Hearing Time: 10:00 a.m.

Location: 411 West 4th Street

Santa Ana, CA 92701

Crtn: 10D

1 Having considered all materials and arguments submitted in support of Lead
2 Plaintiff's Unopposed Motion for Class Distribution Order (the "Motion"), including
3 the Memorandum of Law in Support of the Motion, the Declaration of Josephine
4 Bravata Concerning the Results of the Claims Administration Process ("Bravata
5 Decl."), and the Declaration of Sharon M. McGowan of the Public Justice Foundation,

6 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

7 1. This Class Distribution Order incorporates by reference the definitions
8 in the Stipulation and Agreement of Settlement ([ECF No. 121-1](#)) (the "Stipulation").
9 All capitalized terms not otherwise defined herein shall have the same meaning as set
10 forth in the Stipulation or the Bravata Declaration.

11 2. This Court has jurisdiction over the subject matter of the Action and over
12 all parties to the Action, including all Settlement Class Members.

13 3. Upon the Effective Date of the Settlement, as provided for in the
14 Stipulation at paragraph 31, this Order shall take effect. If the Court disapproves the
15 Settlement, or Effective Date does not otherwise occur, this Order shall be null and
16 void.

17 4. As set forth in the Bravata Declaration, the administrative determinations
18 of the Claims Administrator in accepting and rejecting Claims are approved.
19 Specifically, the administrative determinations of the Claims Administrator accepting
20 those Claims set forth in Exhibits C-1 and C-2 of the Bravata Declaration are
21 approved. Likewise, the administrative determinations of the Claims Administrator
22 rejecting those Claims set forth in Exhibits D and E of the Bravata Declaration are
23 approved.

24 5. As set forth in the Bravata Declaration, no new Claims may be accepted
25 after January 10, 2025, and no further adjustments to submitted Claim may be made
26 for any reason after January 28, 2025.

27 6. The distribution plan for the Net Settlement Fund as set forth in the
28 Bravata Declaration and accompanying exhibits is approved. Following the Effective

1 Date (as provided for in the Stipulation at paragraph 31), the balance of the Net
2 Settlement Fund, shall be distributed to Authorized Claimants. To encourage
3 Authorized Claimants to promptly deposit their payments, all distribution checks will
4 bear a notation: “CASH PROMPTLY, VOID AND SUBJECT TO RE-
5 DISTRIBUTION 180 DAYS AFTER ISSUE DATE.” Authorized Claimants who
6 fail to cash, deposit, or negotiate a distribution check within the time allotted or
7 consistent with the terms outlined in Paragraph 21(a)(vi) of the Bravata Declaration
8 will irrevocably forfeit all recovery from the Settlement.

9 7. After the Initial Distribution of the Net Settlement Fund, the Claims
10 Administrator shall make reasonable and diligent efforts to have Authorized
11 Claimants cash, deposit, or negotiate their distribution checks. To the extent any
12 monies remain in the fund nine (9) months after the Initial Distribution, if Lead
13 Counsel, in consultation with the Claims Administrator, determines that it is cost-
14 effective to do so, the Claims Administrator shall conduct a redistribution of the funds
15 remaining after payment of, or reserve for, any unpaid fees and expenses incurred in
16 administering the Settlement, including for such redistribution, payment of any Taxes,
17 costs of preparing tax returns and escrow fees, to Authorized Claimants who have
18 cashed their Initial Distributions and who would receive at least \$10.00 from such
19 redistribution. Additional redistributions to Authorized Claimants who have cashed,
20 deposited, or negotiated their prior checks and who would receive at least \$10.00 on
21 such additional redistributions may occur thereafter if Lead Counsel, in consultation
22 with the Claims Administrator, determines that additional redistributions, after the
23 deduction of any additional fees and expenses incurred in administering the
24 Settlement, including for such redistributions, would be cost-effective.

25 8. At such time as Lead Counsel, in consultation with the Claims
26 Administrator, determine that no additional distributions are cost-effective, then the
27 remaining funds will be donated to the Public Justice Foundation, a non-sectarian,
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1 not-for-profit 501(c)(3) organization dedicated to, among other things, investor
2 education and advocacy.

3 9. All persons involved in the review, verification, calculation, tabulation,
4 or any other aspect of the processing of the claims submitted herein, or otherwise
5 involved in the administration or taxation of the Settlement Fund or the Net Settlement
6 Fund, are released and discharged from any and all claims arising out of such
7 involvement, and all Settlement Class Members and other Claimants, whether or not
8 they are to receive payment from the Net Settlement Fund, are barred from making
9 any further claim against the Net Settlement Fund, Lead Plaintiff, Lead Counsel,
10 Plaintiff's Counsel, the Claims Administrator, the Escrow Agent, or any other agent
11 retained by Lead Plaintiff or Lead Counsel in connection with the administration or
12 taxation of the Settlement Fund or the Net Settlement Fund, or any other person
13 released under the Settlement beyond the amounts allocated to them pursuant to the
14 terms of this Class Distribution Order, provided that such released persons acted in
15 accordance with the Stipulation, the Judgment, and this Order.

16 10. The Claims Administrator is authorized to destroy: (a) paper or hard
17 copies of the Claim Forms and supporting documents one year after the Second
18 Distribution, if that occurs, or, if there is no Second Distribution, two years after the
19 Initial Distribution; and (b) electronic copies of the same one year after the final
20 distribution of the Net Settlement Fund to Authorized Claimants.

21
22 **SO ORDERED** this 11th day of March, 2025.

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24 _____
25 HONORABLE FRED W. SLAUGHTER
26 UNITED STATES DISTRICT JUDGE
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