

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

CECILIA CALDERON, on behalf of herself)	
and all similarly situated individuals,)	
)	
Plaintiff,)	Case No. 2024 CH 3477
v.)	
)	Honorable Patrick T. Stanton
MAX PRIVATE LABEL, INC.,)	
)	Calendar 6
Defendant.)	

A60191D

PRELIMINARY APPROVAL ORDER

This matter coming before the Court on Plaintiff's Motion and Memorandum of Law for Preliminary Approval of Class Action Settlement ("the Motion"), the Court having reviewed and considered the Motion, the Class Action Settlement Agreement ("Settlement" or "Settlement Agreement"), including all attachments to the Settlement Agreement, and the Court being fully advised in the premises,

IT IS HEREBY ORDERED AS FOLLOWS:

1. Capitalized terms used and not otherwise defined in this Order are defined in the Settlement Agreement.
2. The Settlement is preliminarily approved as fair, reasonable, and adequate. The Settlement Agreement was negotiated at arm's-length between counsel who are experienced in class action litigation.
3. For settlement purposes only, the Court finds that the requirements for a class action under Section 2-801 of the Illinois Code of Civil Procedure are preliminarily satisfied, including numerosity, commonality and predominance, adequacy, and appropriateness of class treatment. The "Class Period" is defined as:

April 19, 2019, through April 19, 2024.

The Settlement Class is defined as:

All individuals employed by MAX PRIVATE LABEL, INC. between April 19, 2019, and April 19, 2024, who had their biometric identifiers, including "fingerprint scans" collected, captured, received, or otherwise obtained by Defendant.

4. For settlement purposes only, the Court appoints Cecilia Calderon Settlement Class Representative.

5. For settlement purposes only, the Court appoints the following attorneys as Settlement Class Counsel:

Jordan Richards
USA Employment Lawyers – Jordan Richards PLLC
1800 SE 10th Ave. Suite 205
Fort Lauderdale, Florida 33316
Phone: (954) 871-0050
E-mail: jordan@jordanrichardspllc.com

6. The Court approves the Notices of Class Action Settlement (“Notice”) attached as Exhibit 1 to the Settlement Agreement and orders distribution of the Notice to the Class Members described in the Settlement Agreement. Issuance of the Notice via direct U.S. Mail, e-mail, and text message satisfies due process, the requirements of Section 2-803 of the Illinois Code of Civil Procedure and constitutes the best notice practicable under the circumstances. The deadline to disseminate the Notice is January 16, 2026.

7. The Court appoints ILYM Group as the Settlement Administrator to perform all duties described in the Settlement Agreement or ordered by this Court.

8. Any Settlement Class Member may request to be excluded from the Settlement by submitting a written request for exclusion to the Settlement Administrator as described in the Notice within 60 days from the date the Notice is mailed. The exclusion deadline is March 17, 2026.

9. Any Settlement Class Member who excludes himself or herself from the Settlement will not be entitled to any recovery under the Settlement and will not be bound by the Settlement or have any right to object, appeal, or comment on it.

10. Any Settlement Class Member who does not request to be excluded from the Settlement may object to the Settlement by submitting a written statement to the Settlement Administrator as described in the Notice within 60 days from the date the Notice is mailed. The objection deadline is March 17, 2026.

11. Within 30 days after the date of the initial distribution of the Notice to Settlement Class Members, Settlement Class Counsel shall file a motion for attorney’s fees, litigation costs, settlement administration costs, and the Settlement Class Representative’s Service Award. The deadline to file the motion for attorney’s fees, litigation costs, settlement administration costs, and the Settlement Class Representative’s Service Award is February 16, 2026.

12. Within seven days before the Final Approval Hearing, Settlement Class Counsel shall file a motion for Final Approval of the Settlement and provide a courtesy copy to chambers of the undersigned. The deadline to file a motion for Final Approval of the Settlement and provide a courtesy copy to chambers is April 2, 2026.

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13. The Court schedules a Final Approval Hearing for April 9, 2026, at 9:30 a.m. CT to consider, among other things, (1) whether to finally approve the Settlement; (2) whether to approve Settlement Class Counsel's request for attorney's fees and litigation costs; (3) whether to approve the Class Representative's request for a Service Award; (4) whether to approve the Settlement Administrator's costs; and (5) whether a final judgment as provided under the Settlement Agreement should be entered, including an order dismissing the claims in the Action against Defendant. The Final Approval Hearing will take place in-person unless no objections are submitted, in which case, the Final Approval Hearing will take place via Zoom. The instructions for the Zoom are as follows: (Meeting ID: 928 4730 2982; Password: 411367; Call-in # (312) 626-6799).

14. The Final Approval Hearing may be postponed, adjourned, transferred, or continued by order of the Court without further notice to the Settlement Class Members.

15. At or following the Final Approval Hearing, the Court may enter a final judgment approving the Settlement and entering a Final Approval Order in accordance with the Settlement that adjudicates the rights of all Settlement Class Members.

16. All proceedings in the Action remain stayed until further order of the Court except such actions as may be necessary to implement the Settlement Agreement and this Order.

ENTERED Judge Patrick T. Stanton-2184					
DEC 02 2025					
 MARTYANA T. SPYROPOULOS CLERK OF THE CIRCUIT COURT COOK COUNTY, IL					
The Honorable Patrick T. Stanton					
<table border="1"><tr><td>Calendar 6 ccc.chancerycalendar6@cookcountyl.gov (312) 603-4890</td></tr><tr><td>Zoom Meeting ID: 928 4730 2982</td></tr><tr><td>Zoom Password: 411367</td></tr><tr><td>Zoom Call-In: (312) 626-6799</td></tr></table>		Calendar 6 ccc.chancerycalendar6@cookcountyl.gov (312) 603-4890	Zoom Meeting ID: 928 4730 2982	Zoom Password: 411367	Zoom Call-In: (312) 626-6799
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Attorney: Jordan Richards

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Attorney for: Plaintiff

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