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14 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE CITY AND COUNTY OF SAN FRANCISCO**

16 ANGELICA COSIO, an individual,
17 on her own behalf and on behalf of all
18 others similarly situated,

18 Plaintiff,

19 v.

20 INTERNATIONAL PERFORMING
21 ARTS ACADEMY, LLC, a
22 California limited liability company,
23 BARBIZON SCHOOL OF SAN
24 FRANCISCO, INC., a California
25 corporation, LION MANAGEMENT
26 GROUP INC., a California
27 corporation, ANTHONY LOUIS
28 LIONETTI, LARRY D. LIONETTI,
LENA QUESADA LIONETTI,
LENA M. LIONETTI, and DOES 1-
100, inclusive,

Defendants.

Case No. CGC-16-551337

**[PROPOSED] ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

The Honorable Anne-Christine Massullo
Department 304
Civic Center Courthouse
400 McAllister Street
San Francisco California 94102

Date: October 19, 2020
Time: 9:15 a.m.

Complaint Filed: April 6, 2016

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1 4. The Court certifies a Settlement Class, consistent with the definition in the
2 Preliminary Approval Order, for final judgment in this order:

3 All natural persons who were California citizens at the time Cosio's
4 original complaint was filed (April 5, 2016) who (a) signed a
5 contract so that the Class member, the Class member's child (or
6 other beneficiary) could participate in a showcase operated by
7 International Performing Arts Showcase (IPAS); (b) paid IPAS for
8 such contract; and (c) such payment was made on or after April 5,
9 2012; (d) excluding any such payments that were (i) a percentage of
10 the income earned by the Class member's beneficiary in the
11 entertainment industry; or (ii) consisted entirely of reimbursement
12 for out-of-pocket costs actually incurred by IP AS on behalf of the
13 Class member's beneficiary for services rendered by an independent
14 third party.

15 (Preliminary Approval Order, ¶5.) The Court orders, however, that the following Class
16 Members have validly excluded themselves from the Final Settlement, and are not Settlement
17 Class Members:

18 Azra Muslic

19 5. The Court finds in this final order that this action may be maintained as a class
20 action on behalf of the Settlement Class for the purposes of effectuating the Final Settlement,
21 that Plaintiff and Class Counsel fairly and adequately represented the interests of the
22 Settlement Class, and that Class Counsel acted adequately as counsel for the Settlement Class.

23 6. The Court finds in this final order that the Final Settlement is fair, reasonable,
24 and adequate under the circumstances. The Court grants final approval to the Final Settlement.

25 7. The Court finds that the Final Settlement represents a fair resolution of all
26 Released Claims (as defined in the Final Settlement) and fully and finally resolves and releases
27 all such Released Claims; that Plaintiff and each Settlement Class Member shall be bound by
28 the Final Settlement, including the release and dismissal contained in Sections 7.2 and 7.3 of
the Settlement Agreement and 12.1 of the First Amendment to the Settlement Agreement; and
that the Final Settlement is finally approved.

 8. The Court overrules any objections from the Final Settlement (except for those
objections to which the Parties agreed do not require a material modification of the Final
Settlement).

1 9. The Court hereby finally dismisses all claims released under Sections 7.2, 7.3,
2 and 7.4 in the Final Settlement with prejudice, and 12.1 of the First Amendment to the
3 Settlement Agreement, and enters judgment on such claims. However, consistent with the
4 Final Agreement, the Court’s judgment and final order are premised on Defendants’ warranty
5 of the truthfulness, accuracy, and completeness of their financial disclosures to the Court and
6 to Class Counsel and compliance with the Court’s Preliminary Approval Order.

7 10. The Court orders that the parties shall collect and distribute the Settlement Fund
8 consistent with Section 6.3 in the January 3, 2020 Settlement Agreement, as amended by
9 Sections 5.1 to 5.2 and 10.1 to 10.10 in the Amendment to Settlement Agreement.

10 11. The Court orders that the parties shall transmit a report to the Court on the total
11 amount of the settlement fund that was actually paid to the Class Members, and the amount
12 remaining in the settlement fund, within 20 days after the final distribution.

13 12. The Court orders that _____ (or,
14 instead, BizParentz Foundation) shall be the Cy Pres Recipient under the Final Settlement, and
15 holds that distribution of payment of any money remaining in Settlement Fund to the Cy Pres
16 Recipient will further the purposes of the underlying causes of action, promote justice for all
17 Californians, and/or will support projects that will benefit the class or similarly situated
18 persons. Any unpaid residuals shall be paid to the Cy Pres Recipient, consistent with Section
19 6.3(i) of the Settlement Agreement.

20 13. The Court retains jurisdiction over the parties to enforce and interpret the terms
21 and conditions of the Final Settlement.

22
23 DATED: _____

24 Hon. Christine-Anne Massullo
25 Judge of the Superior Court
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