

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF JACKSON

**RENEE MAZA, JODI REAL, AND STEVE
PRICE, individually and on behalf of all
similarly situated,**

Plaintiffs,

v.

**WATERFORD OPERATIONS, LLC AND
COOS BAY REHABILITATION, LLC,**

Defendants.

Case No. 14CV03147

ORDER OF PRELIMINARY
APPROVAL OF
STIPULATION AND
SETTLEMENT AGREEMENT
OF CLASS ACTION

This matter has come before the Court on Plaintiffs’ Unopposed Motion for Preliminary Approval of a class action settlement pursuant ORCP 32 and the trial court having jurisdiction under ORS 19.410(3) for purposes of court oversight of the class action Settlement as required by ORCP 32. The Parties have jointly submitted the Stipulation and Settlement of Class Action Claims (herein “Settlement Agreement”).¹ Certification of the claims advanced by the Settlement will achieve a definite and certain result for the benefit of Class Members and is preferable to continuing litigation on appeal or collection efforts which would necessarily encounter risk, uncertainty, delay, and cost. This Order is entered exclusively for purposes of this Settlement.

Preliminarily, this Court finds that the following terms and conditions shall apply to this Order:

¹ The terms used in this Order have the same meaning and intent as those used and defined in the Settlement Agreement.

1. The Settlement resulted from extensive arm's-length negotiations. The Settlement Agreement was executed only after Plaintiffs' Counsel had conducted extensive investigation and discovery regarding collections of the amounts awarded in the Judgments. The Settlement evidenced by the Settlement Agreement is sufficiently fair, reasonable, and adequate to warrant approval to send Notice of the Settlement to Class Members.
2. The classes are defined as detailed in the General Judgment with the Class Members being those persons identified in Attachments A and B to the General Judgment already entered in this case.
3. Because the Court had previously ordered that Notice be sent to the Class Members pursuant to ORCP 32F(1) with the ability to request exclusion from this case, the Notice of the Settlement shall provide a process by which Class Members have the option to file objections to the Settlement.

In accordance with the foregoing terms, conditions and for purposes of this Settlement, this Court ORDERS as follows:

1. The classes shall remain as defined in the General Judgment with those listed in Attachments A and B to the General Judgment as Class Members.
2. The class period remains March 22, 2007 through and including March 22, 2013.
3. Plaintiffs Renee Maza, Jodi Real and Steve Price shall remain as the Class Representatives.
4. Attorneys David A. Schuck, Karen A. Moore and Stephanie Brown at Schuck Law, LLC shall remain as Class Counsel. These attorneys are capable of fairly and adequately continuing their representation of the Class Members, in that they

1 have done extensive work identifying or investigating potential claims in the
2 action. Schuck Law is experienced in handling class actions and claims of the
3 type asserted in the Lawsuit; are knowledgeable of the applicable law; and have
4 committed the necessary resources to represent the Class.

5 5. Approval of the Notice of Class Action Settlement, which is exhibit 1 to the
6 Settlement Agreement. With respect to such form of Notice, the Court finds that
7 such form of notice meets the requirements of due process and provides the best
8 notice practicable under the circumstances and shall constitute due and sufficient
9 notice to all persons entitled thereto.

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11 6. Approves the proposed detailed notice procedures as outlined in the Settlement
12 Agreement for providing Notice to Class Members. The Court finds that the
13 notice procedures in the Settlement Agreement are fair, adequate and reasonable
14 for providing the best notice practicable to Class Members. The Court appoints
15 RG2 Claims Administration LLC as “Settlement Administrator” to administer the
16 Settlement in accordance with this Order and the requirements set forth in the
17 Settlement Agreement.

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19 7. Any Class Member who wishes to object to the Settlement Agreement, to the
20 proposed award of attorneys’ fees and costs, or to any request for compensation
21 for the Plaintiffs may file an Objection. Objectors or their attorneys intending to
22 appear at the Final Approval Hearing must include a written statement with any
23 objection and inform the court that they intend to appear at the Final Approval
24 Hearing. Any objector or their counsel who does not timely file and serve a
25 written objection complying with the requirements in the Settlement Agreement
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1 shall be deemed to have waived any rights to object, and shall be foreclosed from
2 raising any objection to the Settlement. Any untimely objection shall be barred.

- 3 8. The Final Approval Hearing is scheduled for on or about March 6, 2025 to
4 determine, among other things:
- 5 a. Whether the Settlement should be given final approval as fair, reasonable and
6 adequate;
 - 7 b. Whether Class Counsel's request for an award of attorneys' fees, costs and
8 expenses should be approved; and
 - 9 c. Whether the Service Awards to the Class Representatives should be approved.

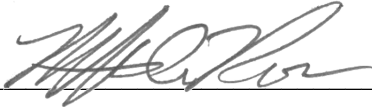
10 9. The Court reserves the right to continue the Final Approval Hearing without
11 further written notice.

12 10. The Court finds that the procedures, deadlines and timing of events as detailed in
13 the Settlement Agreement are fair, reasonable and adequate. The Court
14 incorporates those procedures, deadlines and the timing of events detailed in the
15 Settlement Agreement in this Order as if each were set forth herein.

16 11. The Court hereby retains jurisdiction for purposes of implementing the Settlement
17 Agreement and reserves the power to enter additional orders to effectuate the fair
18 and orderly administration of the Settlement Agreement as may from time to time
19 be appropriate and to resolve any and all disputes arising thereunder.
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21
22 IT IS SO ORDERED.

23 12/23/2024 3:00:29 PM

24 

25 Circuit Court Judge, Matt Rowan
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1 **Stipulated and submitted by**

2 SCHUCK LAW, LLC

3 Date: November 26, 2025

BUCKLEY LAW, PC

Date: November 26, 2025

4 s/ Karen A. Moore

5 David A. Schuck, OSB 993564

6 Karen A. Moore, OSB 040922

7 Stephanie J. Brown, OSB 0300019

8 Attorneys for Plaintiffs and Class

s/ William Gaar²

William Gaar, OSB 890464

Jillian Pollock, OSB 072494

Attorneys for Defendants

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² Electronic signature provided after receipt of written permission by the corresponding attorney.
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CERTIFICATE OF READINESS – UTCR 5.100

Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147

This proposed order or judgment is ready for judicial signature because each party affected by this order or judgment has stipulated to the order or judgment, as shown by each party's signature on the document being submitted.

Dated: December 2, 2024.

s/ Karen A. Moore
KAREN A. MOORE, OSB 040922
kmoore@wageclaim.org
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

Renee Maza, Jodi Real, and Steve Price v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC, case no. 14CV03147

I hereby certify that I caused to be served the foregoing **PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT** upon:

William Gaar & Jillian Pollock
Buckley Law, PC
5300 Meadows Road, Suite 200
Lake Oswego, OR 97035
weg@buckley-law.com; jp@buckley-law.com

Attorneys for Defendant

by electronic mailing through the Oregon Electronic Court system, in accordance with UTCR 21.100, on December 2, 2024.

DATED: December 2, 2024.

s/ Karen A. Moore
KAREN A. MOORE, OSB 040922
kmoore@wageclaim.org
Attorney for Plaintiffs