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Josh Voorhees, State Bar No. 241436  
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Attorneys for Plaintiff  
PETER ENGLANDER

RECEIVED  
ALAMEDA COUNTY

MAR 23 2015

FILED CLERK OF THE SUPERIOR COURT  
ALAMEDA COUNTY Jonathan Pharr  
Deputy

MAY - 5 2015

CLERK OF THE SUPERIOR COURT  
By [Signature] Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

UNLIMITED CIVIL JURISDICTION

LAURENCE VINOCUR, *et al.*,

Plaintiffs,

v.

ABAD FOAM, INC., *et al.*,

Defendants.

Case No. RG14710984

**[PROPOSED] ORDER APPROVING  
PROPOSITION 65 SETTLEMENT AND  
[PROPOSED] CONSENT JUDGMENT  
AS TO DEFENDANT FLEXIBLE  
FOAM PRODUCTS, INC.**

Date: May 5, 2015

Time: 2:30 p.m.

Dept.: 17

Judge: Hon. George C. Hernandez, Jr.

Reservation No. R-1601546

1 Plaintiff Peter Englander and defendant Flexible Foam Products, Inc. have agreed to the  
2 terms of the settlement memorialized in the [Proposed] Consent Judgment ("Consent  
3 Judgment") attached as Exhibit A to the Declaration of Brian C. Johnson in Support of Motion  
4 to Approve Proposition 65 Settlement and Consent Judgment lodged herewith, and plaintiff has  
5 moved this Court for an Order approving the settlement.


6 After consideration of the papers submitted and the arguments presented, the Court  
7 finds that the settlement agreement set forth in the Consent Judgment meets the criteria  
8 established by California Health & Safety Code § 25249.7(f)(4), in that:

- 9 1. The injunctive relief required by the Consent Judgment complies with  
10 Proposition 65;
- 11 2. The reimbursement of fees and costs provided by the Consent Judgment is  
12 reasonable under California law; and
- 13 3. The civil penalty amount to be paid pursuant to the Consent Judgment is  
14 reasonable.

15 Accordingly, the Motion for Approval of the Proposition 65 Settlement is GRANTED.

16  
17 **IT IS SO ORDERED.**

18  
19 Dated: 5/5/2015

  
JUDGE OF THE SUPERIOR COURT

GEORGE C. HERNANDEZ, JR.