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16 Attorneys for Plaintiff

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF SANTA CLARA**

19 YOUNES MCHAAR, an individual,

20 Plaintiff,

21 vs.

22 FEDEX GROUND PACKAGE
23 SYSTEM, INC., a Delaware
24 Corporation; ERICA RODRIGUEZ, an
25 Individual; and DOES 1 through 25,

26 Defendants.

CASE NO.: 20CV366270

Filed: April 27, 2020

Assigned to Hon. Lori E. Pegg. Dept. 5

~~PROPOSED~~ FINAL JUDGMENT

Hearing Date: None set

Trial Date: April 17, 2023

27 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
28 RECORD HEREIN:

PLEASE TAKE NOTICE THAT on April 17, 2023, this action came on regularly for jury trial before the Honorable Lori E. Pegg, Santa Clara Superior Court Judge presiding. Plaintiff YOUNES MCHAAR appeared through his attorneys of record, J. Bernard Alexander, III and Jacqueline Gil of Alexander Morrison + Fehr LLP, and Bryan Schwartz

FILED

JUN 08 2023

Clerk of the Court
Superior Court of CA County of Santa Clara
BY J. Morriss DEPUTY

J. Morriss

[PROPOSED] FINAL JUDGMENT

1 and Renato Flores of Bryan Schwartz Law. Defendant FEDEX GROUND PACKAGE
2 SYSTEM, INC. appeared through its attorneys of record, Brett Wendt and Chris Alvarez
3 of Fisher & Phillips, LLP and Mitchell Bober, in-house legal counsel for Defendant FedEx
4 Ground Package System, Inc.

5 A jury of twelve persons was impaneled and sworn. Witnesses were sworn and
6 testified. After hearing the evidence and arguments of counsel, the jury was duly
7 instructed by the Court and the case was submitted to the jury with directions to return a
8 verdict on the special verdict questions. The jury deliberated and thereafter, on May 12,
9 2023, returned with a special verdict and answers thereto, as reflected in the special
10 verdict form, a true and correct copy of which is attached as "Exhibit 1."

11 The aforesaid special verdict was signed and dated by the foreperson of the jury
12 and otherwise appearing regular and complete on its face, was received and entered by
13 the Court on May 12, 2023.

14 By virtue of the jury's special verdict and pursuant to the law applicable to this
15 case, it is hereby ORDERED, ADJUDGED, AND DECREED that:

16 That Plaintiff YOUNES MCHAAR is awarded compensatory damages in the
17 amount of \$2,000,000 against FEDEX GROUND PACKAGE SYSTEM, INC.;

18 That Plaintiff YOUNES MCHAAR and his counsel of record shall recover attorney
19 fees against Defendant FEDEX GROUND PACKAGE SYSTEM, INC., in the amount of

20 *Jef* \$ To Be Determined as ordered by the Court;

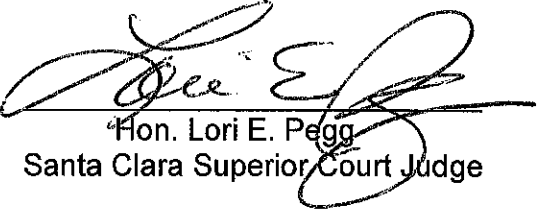
21 That Plaintiff YOUNES MCHAAR and his counsel of record shall recover costs
22 and/or disbursements, as taxed, against Defendant FEDEX GROUND PACKAGE

23 SYSTEM, INC. in the amount of \$ To Be Determined *Jef*

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25 ///
26 ///
27 ///
28 ///

1 That, on June 28, 2021, Plaintiff served Defendant FEDEX GROUND PACKAGE
2 SYSTEM, INC. with a Code of Civil Procedure §998 Statutory Offer to Compromise in the
3 amount of \$500,000, inclusive of costs and attorney fees, which expired without
4 acceptance on July 28, 2021. As such, interest of 10% per annum shall accrue on the
5 total judgment, beginning from June 28, 2021.

6
7
8 IT IS SO ORDERED.

9
10 Dated: 6-8-2023 
11 Hon. Lori E. Pegg
12 Santa Clara Superior Court Judge

FILED
JUN 08 2023

Clerk of the Court
Superior Court of CA County of Santa Clara
BY J MORRIS DEPUTY

J. Morriss



**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
DOWNTOWN COURTHOUSE
191 NORTH FIRST STREET
SAN JOSE, CALIFORNIA 95113
CIVIL DIVISION**

RE: **Younes McHaar vs FedEx Ground Package System Inc. et al**
Case Number: **20CV366270**

PROOF OF SERVICE

FINAL JUDGMENT was delivered to the parties listed below the above entitled case as set forth in the sworn declaration below.

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line (408) 882-2690 or the Voice/TDD California Relay Service (800) 735-2922.

DECLARATION OF SERVICE BY MAIL: I declare that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown below, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on June 08, 2023. CLERK OF THE COURT, by Jenniffer Morriss, Deputy.

cc: Christopher S Alvarez FISHER & PHILLIPS LLP 621 Capitol Mall, Suite 1400 SACRAMENTO, CA 95814
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