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**[PROPOSED] ORDER**

The Court has before it the Motion for Preliminary Approval brought by Plaintiffs CARLOS QUEZADA and REYNALDO DOMINGUEZ BLANCAS. After reviewing the Motion for Preliminary Approval, the Class Action and PAGA Settlement Agreement, and Class Notice (“Settlement Agreement”) filed with the Court, and good cause appearing therefore, the Court hereby finds and orders as follows:

1. The Court finds on a preliminary basis that the settlement memorialized in the Settlement Agreement appears to be fair, adequate, and reasonable, and therefore meets the requirements for preliminary approval.

2. The Court conditionally certifies for settlement purposes only the following class:

All persons who are or were previously employed by Defendant in California as hourly, non-exempt employees at any time within the period beginning March 1, 2022, until January 13, 2024.

3. The Court finds, for purposes of settlement only, that the class meets the requirements for certification under § 382 of the California Code of Civil Procedure in that: (1) the Class is so numerous that joinder is impracticable; (2) there are questions of law and fact that are common, or of general interest, to all Settlement Class Members, which predominate over individual issues; (3) the named Plaintiff’s claims are typical of the claims of the Class; (4) the named Plaintiff and Plaintiff’s counsel will fairly and adequately protect the interests of the Class; and (5) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

4. The Court appoints for settlement purposes only Plaintiffs CARLOS QUEZADA and DOMINGUEZ BLANCAS as class representatives.

5. The Court appoints for settlement purposes only Koul Law Firm, APC, Majarian Law Group, APC, Bokhour Law Group, P.C, and Falakassa Law, P.C. as Class Counsel.

6. The Court appoints CPT Group, Inc., as the Settlement Administrator.

1           7.       The parties are ordered to carry out the settlement according to the terms of the  
2 Settlement Agreement.

3           8.       The Court orders the following implementation schedule:

4                   i.       Deadline for Defendant to submit Class Data to the Administrator: within  
5                               fifteen (15) days after entry of the Preliminary Approval Order

6                   ii.       Deadline for Settlement Administrator to mail notice to Class Members:  
7                               Within seven (7) days after the receipt of the Class Data from Defendant;

8                   iii.       Deadline for Class Members to fax, email or postmark written objections,  
9                               Challenges to Workweeks, and Requests for Exclusion (Opt-Out) related  
10                              to the Settlement: Within forty-five (45) days for initial mailing of the  
11                              Notice to be extended by fourteen (14) days for remailing;

12                   iv.       Deadline for serving and filing Motion for Final Approval, Attorney Fee  
13                              Award, and Class Representative Service Payment: Sixteen (16) court days  
14                              before Final Approval Hearing in conformity with Code of Civil Procedure  
15                              § 1005;

16                   v.       Final Approval Hearing: December 16, 2024 at 8:30 a.m.

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18           9.       The Court approves as to form and content the Notice of the proposed settlement,  
19 attached hereto as Exhibit A, which advises Class Members and Aggrieved Employees of the  
20 settlement terms, the preliminary approval of the Settlement, and the scheduling of the Final  
21 Approval Hearing.

22           10.       The Court finds that the timing for the mailing and distribution of the Notice meets  
23 the requirements of due process, provides the best notice practicable under the circumstances, and  
24 constitutes due and sufficient notice to all persons entitled thereto. The Court directs the mailing  
25 of the Notice to all identified Class Members in accordance with the Settlement Agreement.

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27           11.       The Notice is hereby found to be the best means practicable of providing notice  
28 under the circumstances, and, when completed, shall constitute due and sufficient notice of the

1 class and representative action, proposed settlement, and the final approval hearing to all persons  
2 affected by and or authorized to participate in the settlement, in full compliance with due process  
3 and the notice requirements of California Code of Civil Procedure § 877.6.

4 IT IS SO ORDERED.

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6 Dated: \_\_\_\_\_

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8 JUDGE OF THE SUPERIOR COURT  
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