

ORIGINAL

FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

JUL 29 2024

BY *Victoria Sanchez*  
VICTORIA SANCHEZ, DEPUTY

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN BERNARDINO

CARLOS QUEZADA, an individual, on behalf ) Case No.: CIVSB2305893  
of himself and all others similarly situated, )

Plaintiff, )

vs. )

CONAM MANAGEMENT CORPORATION, )  
a California corporation, and DOES 1-50, )  
inclusive, )

Defendant. )

~~PROPOSED~~ ORDER GRANTING  
MOTION FOR PRELIMINARY  
APPROVAL

Date: July 29, 2024  
Time: 8:30 a.m.  
Dept: S26\_

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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 and the Class Action and PAGA Settlement Agreement and Release of Claims ("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 February 29, 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 REYNALDO 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., 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 to  
10               the Settlement: Within forty-five (45) days for initial mailing of the Notice  
11               to be extended by fourteen (14) days for re-mailing;

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: \_\_\_\_\_, 2024 at \_\_\_\_\_ a.m./p.m.

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

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

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11. The Notice is hereby found to be the best means practicable of providing notice under the circumstances, and, when completed, shall constitute due and sufficient notice of the class and representative action, proposed settlement, and the final approval hearing to all persons affected by and/or authorized to participate in the settlement, in full compliance with due process and the notice requirements of California Code of Civil Procedure § 877.6.

IT IS SO ORDERED.

Dated: 7/29/24

  
\_\_\_\_\_  
JESSICA L. MORGAN  
JUDGE OF THE SUPERIOR COURT

**PROOF OF SERVICE**

**Case No. CIVSB2305893**

***Quezada v. ConAm Management Corporation***

I, IRENE SORTO, declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the entitled case. The name and address of my residence or business is KOUL LAW FIRM, 3435 Wilshire Blvd. Ste. 1710, Los Angeles, California 90010.

On July 3, 2024, I served the foregoing document described as:

**[PROPOSED] ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL**

  X   **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address from e-mail ivette@koullaw.com pursuant to California Rules of Court. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

on the interested parties in this action by sending [ ] the original [or] [✓] a true copy thereof [✓] to interested parties as follows [or] [ ] as stated on the attached service list:

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*Attorneys for Defendant  
CONAM MANAGEMENT  
CORPORATION*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this July 3, 2024 in Los Angeles, California.

  
\_\_\_\_\_  
IRENE SORTO