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JORGE PEREZ, on behalf of himself, all putative class members,
aggrieved employees, and the State of California as a
Private Attorneys General

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

JORGE PEREZ, on behalf of himself and
others similarly situated

Plaintiff,

vs.

QUAIL LODGE, INC., a California
Corporation, and DOES 1-50, inclusive,

Defendants.

) Case No.: 22STCV22540 (Lead Case)

) **REVISED ~~PROPOSED~~ ORDER**
) **GRANTING PLAINTIFF'S MOTION**
) **FOR PRELIMINARY APPROVAL**

JORGE PEREZ, an individual, on behalf of
himself, all aggrieved employees, and the State
of California as a Private Attorneys General,

Plaintiff,

vs.

QUAIL LODGE, INC., a California
Corporation, and DOES 1-50, inclusive,

Defendants.

) Case No.: 22STCV00572

1 The Court has before it the Motion for Preliminary Approval brought by Plaintiff JORGE
2 PEREZ. After reviewing the Motion for Preliminary Approval and the Settlement Agreement
3 filed with the Court, and good cause appearing therefore, the Court hereby finds and orders as
4 follows:

5 1. The Court finds on a preliminary basis that the settlement memorialized in the
6 Settlement Agreement appears to be fair, adequate, and reasonable, falls within the range of
7 reasonableness, and therefore meets the requirements for preliminary approval.

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

9 All current and/or former hourly non-exempt employees that
10 worked for Defendant within the period beginning July 13, 2018,
11 until the Court grants preliminary settlement approval.

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

20 4. The Court appoints for settlement purposes only Plaintiff JORGE PEREZ as class
21 representative.

22 5. The Court appoints for settlement purposes only Law Offices of Sahag Majarian,
23 II, and Koul Law Firm as Class Counsel.

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

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

27 8. The Court orders the following implementation schedule:
28

- a. Deadline to mail notices to Class Members: February 5, 2023.
- b. Deadline for serving and filing Motion for Final Approval: June 11, 2024.
- c. Final Approval Hearing: July 11, 2024, at 10:00 a.m.

9. The Court approves as to the form and content the Notice of the proposed settlement which advises Class Members and PAGA Members of the settlement terms, the preliminary approval of the Settlement, and the scheduling of the Final Approval Hearing.

10. The Court finds that the dates selected for the mailing and distribution of the Notice meet the requirements of due process, provides the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons entitled thereto.

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: 02/15/2024



A handwritten signature in black ink, appearing to read "K. Freeman", written over a horizontal line.

JUDGE OF THE SUPERIOR COURT
Kenneth R. Freeman / Judge

PROOF OF SERVICE

Case No. 22STCV22540
Perez v. Quail Lodge, Inc., et al.

I, IVETTE HERNANDEZ 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 January 5, 2024, I served the foregoing document described as:

REVISED [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL

 X **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.

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:

Marlene S. Muraco, Esq.

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LITTLER MENDELSON, P.C.

50 W. San Fernando, 7th Floor

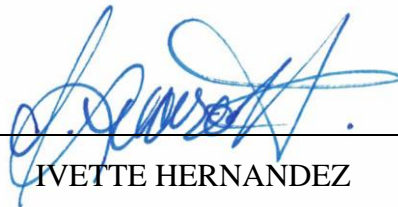
San Jose, CA 95113

Telephone: 408-998-4150

Attorneys for Defendant QUAIL LODGE, INC.

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

Executed on this January 5, 2024, in Los Angeles, California.



IVETTE HERNANDEZ