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**FILED**  
Superior Court of California  
County of Los Angeles

NOV 19 2024

David W. Slayton, Executive Officer/Clerk of Court

By: A. Ortiz, Deputy

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Attorneys for Plaintiff,  
ALEXANDER MONTOYA, on behalf of himself and all others similarly situated, and on behalf  
of the general public

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

ALEXANDER MONTOYA, on behalf of  
himself and all others similarly situated, and  
on behalf of the general public,

Plaintiff,

vs.

MNE CONGLOMERATE, INC., a California  
Corporation, ENW TRUCKING, LLC, a  
California Limited Liability Company, and  
DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 23STCV19730

~~PROPOSED~~ ORDER GRANTING  
PRELIMINARY APPROVAL OF CLASS  
AND REPRESENTATIVE ACTION  
SETTLEMENT

11/20/2024  
11/20/2024

**IT IS HEREBY ORDERED:**

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiff Alexander Montoya as Class Representative;
3. The Court grants preliminary approval of Otkupman Law Firm, A Law Corporation, as Class Counsel;
4. The Court grants preliminary approval of Settlement of claims as set forth in the Settlement Agreement;
5. The Court approves the proposed Class Notice and Exclusion Form;
6. The Court grants preliminary approval of APEX Class Action ("APEX") as Settlement Administrator and payment of service in an amount up to ten thousand dollars (\$10,000.00);
7. The Court grants preliminary approval of a Class Representative Enhancement Payment to Plaintiff Alexander Montoya in an amount up to ten thousand dollars (\$10,000.00);
8. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of sixty-six thousand six hundred dollars (\$66,600.00) and costs up to fifteen thousand dollars (\$15,000.00);
9. The Court grants preliminary approval of the PAGA Payment in the amount of thirty thousand dollars (\$30,000.00). Seventy-five percent of this amount, or twenty-two thousand five hundred dollars (\$22,500.00) will be paid to the LWDA and twenty-five percent of this amount, or seven thousand five hundred dollars (\$7,500.00) will be paid to the Aggrieved Employees who worked for Defendants during the PAGA Period on a pro rata basis.

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10. The Court grants the schedule for implementation of the terms of the Settlement Agreement and the Court sets a hearing on final approval on 5/6/2025 at 8:30 a.m. in Department 45.

DATED: NOV 19 2024

  
HONORABLE MEL RED RECANA  
JUDGE OF THE SUPERIOR COURT

11/20/2024