

Electronically Submitted on 09/19/2024 04:20 PM

RECEIVED  
BY SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF KINGS COUNTY  
09/19/2024  
NOCONA SOBOLISKI, CLERK OF THE COURT  
KAYA GODINEZ, DEPUTY

**FILED**

OCT 28 2024

NOCONA SOBOLISKI, CLERK OF COURT  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF KINGS  
*Darlene Goumas* DEPUTY  
**Darlene Goumas**

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Roman Otkupman, CSBN 249423  
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**OTKUPMAN LAW FIRM, A LAW CORPORATION**  
5743 Corsa Ave., Suite 123  
Westlake Village, CA 91362  
Telephone: (818) 293-5623  
Facsimile (888) 850-1310

Attorneys for Plaintiff,  
JUAN GONZALEZ, 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 KINGS**

JUAN GONZALEZ, on behalf of himself and  
all others similarly situated, and on behalf of  
the general public,

Plaintiff,

vs.

LAWRENCE TRACTOR COMPANY, INC.,  
a California Corporation, and DOES 1 through  
10, inclusive,

Defendants.

CASE NO.: 23CU0180

~~PROPOSED~~ ORDER

**[PROPOSED] ORDER**

**IT IS HEREBY ORDERED:**

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiff Juan Gonzalez 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 as Settlement Administrator and payment of administration costs in an amount up to twenty thousand dollars (\$20,000.00);
7. The Court grants preliminary approval of a Class Representative Enhancement Payment to Plaintiff Juan Gonzalez in the amount of fifteen thousand dollars (\$15,000.00).
8. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of two hundred fifty thousand dollars (\$250,000.00) and costs up to twenty thousand dollars (\$20,000.00);
9. The Court grants preliminary approval of the PAGA Payment in the amount of seventy-five thousand dollars (\$75,000.00). Seventy-five percent of this amount, or fifty-six thousand two hundred fifty dollars (\$56,250.00) will be paid to the LWDA and twenty-five percent of this amount, or eighteen thousand seven hundred fifty dollars (\$18,750.00) will be paid to the Aggrieved Employees who worked for Defendant 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 for 3/26/2025 at 8:15 a .m., in Department ~~XX~~ 2

DATED: 10/28/2024

SIGNED: *Valerie R. Chrissakis*  
Honorable Valerie R. Chrissakis  
Judge of the Superior Court

IN THE SUPERIOR COURT OF CALIFORNIA  
COUNTY OF KINGS  
1640 Kings County Drive  
Hanford, CA 93230

**FILED**

OCT 30 2024

NOCONA SOBOLESKI CLERK OF COURT  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF KINGS  
DEPUTY

*Darlene Goumas*  
**Darlene Goumas**

**Juan Gonzalez, on behalf of himself  
and all others similarly situated, and  
on behalf of the general public,  
Plaintiff / Petitioner,  
vs.  
Lawrence Tractor Company, INC..**

Case No. 23CU0180

**Certificate of Mailing**

I hereby declare under penalty of perjury that I am employed by the Kings County Superior Court, over the age of 18 and not a party to this action.

On October 30, 2024, I served the following, Order, by enclosing a true copy in a sealed envelope, and deposited at my place of business for collection and mailing with United States Mail at Hanford, California, following our ordinary business practices with which I am readily familiar addressed as follows:

Roman Otkupman  
Otkupman Law Firm, A Law Corporation  
5743 Corsa Ave, Suite 123  
Westlake Village, CA 91362

Katherine P. Sandberg  
Hunton Andrews Kurth LLP  
50 California St, Suite 1700  
San Francisco, CA 94111

Date: October 30, 2024

Nocona Soboleski, Court Executive Officer

By: *Darlene Goumas*  
Deputy Court Clerk, Darlene Goumas