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FILED 1 Roman Otkupman, CSBN 249423 Superior Court of California Roman@OLFLA.com County of Sacramento Nidah Farishta, CSBN 312360 03/12/2025 Nidah@OLFLA.com V. Aleman, Deputy OTKUPMAN LAW FIRM, A LAW CORPORATION 5743 Corsa Ave., Suite 123 Westlake Village, CA 91362 Telephone: (818) 293-5623 5 Facsimile (888) 850-1310 6 Attorney for Plaintiff, Sabrena Taylor, on behalf of herself and all others similarly situated, and on behalf of the general 7 public 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA 9 **COUNTY OF SACRAMENTO** 10 11 SABRENA TAYLOR, on behalf of herself CASE NO.: 23CV010783 and all others similarly situated, and on behalf **12** of the general public, [PROPOSED] ORDER GRANTING **13** Plaintiff, PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION 14 **SETTLEMENT** VS. 15 SACRAMENTO LGBT COMMUNITY CENTER, and DOES 1 through 10, inclusive. **16** Defendants. **17** 18 19 **20** 21 22 23 24 25 **26** 27

PROPOSEDIORDER GRANTING PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT

IT IS HEREBY ORDERED:

- 1. The Court grants preliminary approval and conditional certification of the Class;
- 2. The Court grants preliminary approval of Plaintiff Sabrena Taylor 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; ÇÜ^çã^å/å/ç^!•ã} Að/å/å/£DFBEÍ D
- 6. The Court grants preliminary approval of the Gross Settlement Amount of Three Hundred Ninety Thousand Dollars (\$390,000.00);
- 7. The Court grants preliminary approval of Apex Class Action ("Apex") as Settlement Administrator and payment of service in an amount up to Twenty Thousand Dollars (\$20,000.00);
- 8. The Court grants preliminary approval of a Class Representative Enhancement Payment to Plaintiff Sabrena Taylor in an amount up to Ten Thousand Dollars (\$10,000.00);
- 9. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of One Hundred Thirty Thousand Dollars (\$130,000.00) and costs up to Twenty-Five Thousand Dollars (\$25,000.00);
- 10. The Court grants preliminary approval of the PAGA Payment in the amount of Twenty-Five Thousand Dollars (\$25,000.00). Seventy-five percent of this amount, or Eighteen Thousand Seven Hundred Fifty Dollars (\$18,750.00) will be paid to the LWDA and twenty-five percent of this amount, or Six Thousand Two Hundred Fifty Dollars (\$6,250.00) will be paid to the Aggrieved Employees on a pro rata basis.

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