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ELECTRONICALLY FILED BY
Superior Court of California,
County of Monterey
On 08/01/2025
By Deputy: Conder, Perla

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF MONTEREY**

12 GLORIA RODRIGUEZ VINALAEY as an
13 individual, and on behalf of all others similarly
14 situated,

15 Plaintiff,

16 vs.

17 GHM MONTEREY, LLC, a California limited
18 liability company; GREENWOOD HOSPITALITY
19 GROUP, LLC, a Delaware limited liability
20 company; GREENWOOD HOSPITALITY
21 MANAGEMENT, LLC, a Delaware limited
22 liability company; and DOES 1 through 100,
23 inclusive,

24 Defendants.

CASE NO. 24CV001165

*[Assigned for all purposes to the
Hon. Thomas W. Wills.; Dept. 15]*

COMPLEX CLASS ACTION

**~~PROPOSED~~ ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: August 1, 2025
Time: 8:30 a.m.
Dept.: 15

Complaint Filed: March 21, 2024
Trial Date: None Set

1 **[PROPOSED] ORDER**

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3 The Unopposed Motion of Plaintiffs Gloria Rodriguez Vinalaey and Priscilla Zavala
4 (“Plaintiffs”) for Preliminary Settlement Approval of Class and Representative Action came on
5 regularly for hearing before this Court. The Court, having considered the proposed Stipulation
6 and Release Settlement Agreement (“the “Settlement”), attached as **Exhibit A** to the Declaration
7 of Daniel J. Brown In Support of Plaintiffs’ Motion for Preliminary Approval of Class Action
8 and PAGA Settlement (“Brown Decl.”) filed concurrently herewith; having considered Plaintiffs’
9 Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points
10 and Authorities in support thereof, and supporting declarations filed therewith, with good cause
11 appearing, HEREBY ORDERS THE FOLLOWING:
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13 1. The Court GRANTS preliminary approval of the class action settlement as set
14 forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement
15 that ultimately could be granted approval by the Court at a Final Fairness Hearing. For purposes
16 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable and that
17 there is a sufficiently well-defined community of interest among the members of the Settlement
18 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
19 conditional certification of the following Settlement Class:
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21 All current and former non-exempt employees of Defendants GHM Monterey,
22 LLC; Greenwood Hospitality Group, LLC; and Greenwood Hospitality
23 Management LLC who worked for Defendants in California at any time from
March 21, 2020 through April 10, 2025. (“Class Period”).

24 2. For purposes of the Settlement, the Court designates named Plaintiffs Gloria
25 Rodriguez Vinalaey and Priscilla Zavala as Class Representatives, and Daniel J. Brown and
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1 Kathleen J. Becket of Stansbury Brown Law, PC as counsel for Class Members, the State of
2 California and the Aggrieved Employees (“Class Counsel”).

3 3. The Court designates Apex Class Action, LLC as the third-party Settlement
4 Administrator for mailing notices.

5 4. The Court hereby preliminarily approves the Settlement as set forth in the
6 Settlement Agreement as fair, reasonable, and adequate, and directs the Parties to effectuate the
7 Settlement Agreement according to its terms.

8 5. The Court approves, as to form and content, the Notice of Pendency of Class
9 Action and Proposed Settlement (“Class Notice”) attached as **Exhibit B** to the Brown Decl.

10 6. The Court finds that the form of notice to the Settlement Class regarding the
11 pendency of the action and of the Settlement, and the methods of giving notice to members of
12 the Settlement Class constitute the best notice practicable under the circumstances, and constitute
13 valid, due, and sufficient notice to all members of the Settlement Class. The form and method
14 of giving notice complies fully with the requirements of California Code of Civil Procedure
15 section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the
16 California and United States Constitutions, and other applicable law.

17 7. The Court further approves the procedures for Class Members to opt out of,
18 dispute or object to the Settlement, as set forth in the Class Notice.

19 8. The Court approves the procedures and requirements for filing objections in
20 connection with the Final Fairness Hearing as intended to ensure the efficient administration of
21 justice and the orderly presentation of any Class Member’s objection to the Settlement, in
22 accordance with the due process rights of all Class Members.
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1 2 3	Deadline for Settlement Class members to request exclusion from, or object to, the Settlement no later than 60 days after mailing of class notice.	
4 5 6	Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement no later than 10 court days prior to Final Fairness Hearing.	

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14. Pending the Final Fairness Hearing, all proceedings and deadlines in this action, including discovery deadlines, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

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IT IS SO ORDERED.

Dated: August 1, 2025 By: 

Honorable Thomas W. Wills
Judge of the Superior Court