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

**03/16/2026**

David W. Slayton, Executive Officer / Clerk of Court

By:                     E. Muñoz                     Deputy

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

JOSE MORAN, as an individual and on behalf  
of all others similarly situated,

Plaintiff,

vs.

ARACA MERCHANDISE L.P., a New York  
Limited Partnership; ARACA INK LLC, a  
Delaware limited liability company; ARACA  
HOLDINGS LLC, a New York limited liability  
company; and DOES 3 through 100,

Defendants.

CASE NO. 24STCV02003

*[Case assigned for all purposes to the Hon.  
William F. Highberger, Dept. SSC-10]*

**~~AMENDED [PROPOSED]~~ ORDER  
GRANTING PRELIMINARY  
APPROVAL OF CLASS AND PAGA  
ACTION SETTLEMENT**

Date: March 16, 2026  
Time: 10:00 a.m.  
Dept.: SSC-10

Action Filed: January 24, 2024  
SAC Filed: August 27, 2025  
Trial Date: None Set

**AMENDED [PROPOSED] ORDER**

The Motion of Plaintiff Jose Moran (“Plaintiff”) for Preliminary Approval of Class and PAGA Action Settlement came regularly for hearing before this court on March 16, 2026, at 10:00 a.m. The Court, having considered Plaintiff’s Motion for Preliminary Approval of Class and PAGA Action Settlement, the memorandum of points and authorities in support thereof, and supporting declarations filed therewith; the proposed Class Action and PAGA Settlement Agreement and Class Notice (“Settlement Agreement” or “Settlement”), attached as Exhibit 1 to the Declaration of Matthew K. Moen filed concurrently therewith; and good cause appearing, **HEREBY ORDERS THE FOLLOWING:**

1. The Court GRANTS preliminary approval of the class and PAGA action settlement as set forth in the Settlement Agreement, and finds its terms to be within the range of reasonableness of a settlement that ultimately could be granted final approval by the Court at a Final Approval Hearing.

2. The Court preliminarily approves the terms of the Settlement Agreement and finds that they fall within the range of approval as fair, adequate and reasonable. Based on a review of the papers submitted by Plaintiff, the Court finds that the Settlement is the result of arms’ length negotiations conducted after Plaintiff and/or Plaintiff’s counsel adequately investigated the claims and became familiar with the strengths and weaknesses of the claims. The assistance of an experienced mediator in the settlement process supports the Court's conclusion that the Settlement is non-collusive and reasonable. The Settlement is presumptively valid, subject only to any objections that may be raised pursuant to the terms of the Settlement Agreement.

3. For purposes of the Settlement, the Court finds that the proposed Settlement Class<sup>1</sup> is ascertainable and that there is a sufficiently well-defined community of interest among the Class Members in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following Settlement Class:

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<sup>1</sup> As used herein, all specially defined terms shall have the same meaning as described in the Settlement Agreement.

1 All current and former non-exempt employees who worked for Defendants Araca  
2 Merchandise L.P., Araca Ink LLC, and/or Araca Holdings LLC in California  
between January 24, 2020, and January 24, 2025 (the “Class Period”)<sup>2</sup>.

3 4. For purposes of the Settlement, the Court designates named Plaintiff Jose Moran  
4 as Class Representative, and designates Paul K. Haines, Fletcher W. Schmidt, Matthew K. Moen,  
5 and Susan J. Perez of Haines Law Group, APC as Class Counsel.

6 5. The Court designates Apex Class Action Administration as the third-party  
7 Settlement Administrator for mailing notices and other obligations as set forth in the Settlement  
8 Agreement.

9 6. The Court approves, as to form and content, the Court Approved Notice of Class  
10 Action and PAGA Settlement and Hearing Date for Final Court Approval (“Class Notice”)  
11 attached as Exhibit A to the Settlement Agreement.

12 7. The Court finds that the form of notice to the Class Members regarding the  
13 pendency of the Action and of the Settlement, and the methods of giving notice to the Class  
14 Members, constitute the best notice practicable under the circumstances, and constitute valid, due,  
15 and sufficient notice to all Class Members. The form and method of giving notice complies fully  
16 with the requirements of California Code of Civil Procedure § 382, California Rules of Court  
17 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

18 8. The Court further approves the procedures for the Class Members to opt-out of or  
19 object to the Settlement, as set forth in the Class Notice and the Settlement Agreement.

20 9. The procedures and requirements for submitting objections in connection with the  
21 Final Approval Hearing are intended to ensure the efficient administration of justice and the  
22 orderly presentation of any Class Member’s objection to the Settlement, in accordance with the  
23 due process rights of all Class Members.

24 10. The Court directs the Settlement Administrator to mail the Class Notice to the  
25 Class Members in English and Spanish, in accordance with the terms of the Settlement.

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27 <sup>2</sup> Defendants have represented their records show the escalator clause was triggered on approximately  
28 January 24, 2025, and they therefore intend to exercise their right under paragraph 8(b) of the Settlement  
Agreement to designate the end of the Class Period on the date when the aggregate Workweeks worked  
by the Class Members reached 17,292.

1 11. Pursuant to the Settlement Agreement, the Class Notice shall provide at least 60  
2 calendar days' notice for Class Members to submit disputes, opt-out of, or object to the  
3 Settlement, plus an additional 14 days for Class Members to whom the Notice Packets are resent  
4 after having been returned undeliverable to the Administrator.

5 12. The Final Approval Hearing on the question of whether the Settlement Agreement  
6 should be finally approved as fair, reasonable and adequate is scheduled on  
7 8/21/26, at 10 a.m. ~~7 p.m.~~ in Department SSC-10 of this Court, located  
8 at 312 N. Spring Street, Los Angeles, California 90012. The Court reserves the right to continue  
9 the date of the Final Approval Hearing without further notice to the Class Members. The Court  
10 retains jurisdiction to consider all further applications arising out of or in connection with the  
11 Settlement Agreement.

12 13. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement  
13 Agreement should be approved as fair, reasonable, and adequate for the Class Members; (b)  
14 whether a judgment granting final approval of the Settlement should be entered; and (c) whether  
15 Plaintiff's application for a Class Representative Service Payment, settlement administration  
16 costs, payment to the California Labor and Workforce Development Agency ("LWDA") for its  
17 75% share of civil penalties under the Private Attorneys General Act ("PAGA"), Labor Code  
18 § 2698 *et seq.*, and Class Counsel's attorneys' fees and costs should be granted.

19 14. Plaintiff's Counsel shall file memoranda, declarations, or other statements and  
20 materials in support of the request for final approval of the Settlement and Plaintiff's application  
21 for a Class Representative Service Payment, settlement administration costs, payment to the  
22 LWDA for its share of PAGA penalties, and Class Counsel's attorneys' fees and costs prior to the  
23 Final Approval Hearing according to the time limits set by the Code of Civil Procedure and the  
24 California Rules of Court.

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1           15. An implementation schedule is provided below (assuming the Court grants  
2 preliminary approval of the Settlement on March 16, 2026):

Event	Date
Defendants to provide Class Data to Settlement Administrator no later than [30 calendar days from the date of this Order]:	April 15, 2026
Settlement Administrator to mail the Class Notice to the Class Members no later than [10 business days after receipt of Class Data]:	April 29, 2026
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement [60 calendar days after Class Notice is mailed; to which 14 days will be added if the Notice is returned to the Administrator as undeliverable and re-mailed]:	June 28, 2026
Deadline for Plaintiff to file Motion for Final Approval of Class Action and PAGA Settlement:	At least 16 court days prior to Final Approval Hearing
Final Approval Hearing	<input checked="" type="checkbox"/> August 21, 2026 at <del>9:00 a.m.</del> 10 a.m. <input type="checkbox"/> _____, 2026 at _____ a.m./p.m.

17           16. Pending the Final Approval Hearing, all proceedings in this Action, other than  
18 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this  
19 Order, are stayed.

20           17. Counsel for the parties are hereby authorized to utilize all reasonable procedures  
21 in connection with the administration of the Settlement which are not materially inconsistent with  
22 either this Order or the terms of the Settlement.

23           18. In the event the Settlement is not finally approved, or otherwise does not become  
24 effective in accordance with the terms of the Settlement, this Order shall be rendered null and  
25 void and shall be vacated, and the parties shall revert to their respective positions as of before  
26 entering into the Settlement.

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**IT IS SO ORDERED.**

Dated: 03/16/2026



Honorable William F. Highberger  
Judge of the Superior Court