



1 **[PROPOSED] ORDER**

2 The Motion of Plaintiffs Luckie Nunez and Elba Mancía (“Plaintiffs”) for Preliminary  
3 Approval of Class Action and PAGA Settlement (“Motion”) came on regularly for hearing before  
4 this Court on January 30, 2026. The Court, having considered the proposed Joint Stipulation of  
5 Class Action and PAGA Settlement attached as **Exhibit 3** to the Declaration of Ryan Chuman,  
6 (“Settlement Agreement” or “Settlement”), filed concurrently with the Motion and the declaration  
7 itself, having considered Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA  
8 Settlement, memorandum of points and authorities in support thereof, and other supporting  
9 documents; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

10 1. The Court GRANTS preliminary approval of the class action settlement as set forth  
11 in the Settlement Agreement and finds its terms to be within the range of reasonableness of a  
12 settlement that ultimately could be granted approval by the Court at a Final Fairness hearing. All  
13 terms used herein shall have the same meaning as defined in the Settlement Agreement. For  
14 purposes of the Settlement only, the Court finds that the proposed Class is ascertainable and that  
15 there is a sufficiently well-defined community of interest among the members of the Class in  
16 questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional  
17 certification of the following settlement Class:  
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19 All current and former hourly paid, non-exempt employees of Defendant R.H.  
20 Peterson Co. (“Defendant”) who worked for Defendant in the state of California at  
any time between May 23, 2020, and October 27, 2025.

21 2. For purposes of the Settlement only, the Court designates Plaintiffs as the Class  
22 Representatives, and designates Protection Law Group, LLP, Koul Law Firm, APC, and Majarian  
23 Law Group APC as Class Counsel.

24 3. The Court designates Apex Class Action, LLC as the third-party Settlement  
25 Administrator.

26 4. The parties are ordered to implement the Settlement according to the terms of the  
27 Settlement Agreement.  
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1           5.     The Court approves, as to form and content, the proposed Notice of Proposed Class  
2 Action Settlement and Final Approval Hearing (“Notice of Settlement”) attached as **Exhibit A** to  
3 the Settlement.

4           6.     The Court finds that the form of notice to the Class regarding the pendency of the  
5 action and of the Settlement, the dates selected for mailing and distribution, and the methods of  
6 giving notice to members of the Class, satisfy the requirements of due process, constitute the best  
7 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all  
8 members of the Class. The form and method of giving notice complies fully with the requirements  
9 of California Code of Civil Procedure §382, California Civil Code §1781, California Rules of  
10 Court §§3.766 and 3.769, the California and United States Constitutions, and other applicable law.

11           7.     The Court further approves the procedures for Class Members to opt-out of or  
12 object to the Settlement, as set forth in the Notice of Settlement and the Settlement Agreement.  
13 The procedures and requirements for filing objections in connection with the final fairness hearing  
14 are intended to ensure the efficient administration of justice and the orderly presentation of any  
15 Class Member’s objection to the Settlement, in accordance with the due process rights of all Class  
16 Members.

17           8.     The Court directs the Settlement Administrator to mail the Notice of Settlement to  
18 the members of the Class in accordance with the terms of the Settlement.

19           9.     The Notice of Settlement shall provide 45 days’ notice for Class Members to submit  
20 disputes, opt-out of, or object to the Settlement.

21           10.    The hearing on Plaintiffs’ Motion for Final Approval of Settlement on the question  
22 of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled  
23 in Department 1 of this Court, located at 312 North Spring Street, Los Angeles, CA 90012, on  
24       July 13      , 2026 at   10:30   a.m./~~p.m.~~

25           11.    At the Final Fairness hearing, the Court will consider: (a) whether the Settlement  
26 should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting  
27 final approval of the Settlement should be entered; and (c) whether Plaintiffs’ application for  
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1 service and release awards, settlement administration costs, and Class Counsel’s attorney’s fees  
2 and costs, should be granted.

3 12. Counsel for Plaintiffs shall file memoranda, declarations, or other statements and  
4 materials in support of their request for final approval of Plaintiffs’ application for service and  
5 release awards, settlement administration costs, Class Counsel’s attorneys’ fees and costs, prior to  
6 the hearing on Plaintiffs’ Motion for Final Approval of Settlement according to the time limits set  
7 by the Code of Civil Procedure and the California Rules of Court.

8 13. An implementation schedule is below:

<b>Event</b>	<b>Date</b>
Defendants to provide class contact information to Settlement Administrator no later than:	[21 days following preliminary approval]
Settlement Administrator to mail the Notice of Settlement to the Class no later than:	[14 days following provision of contact information]
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	[45 days after mailing of the Notice of Settlement]
Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement:	_____ [16 court days before the Final Approval Hearing]
Hearing on Motion for Final Approval of Settlement (suggested date May 26, 2026)	July 13, 2026 at 10:30 a.m. _____

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26 14. Pending the Final Fairness hearing, all proceedings in this action, other than  
27 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this  
28 Order, are stayed. To facilitate administration of the Settlement pending final approval, the Court

1 hereby enjoins Plaintiffs and all members of the Class from filing or prosecuting any claims, or  
2 suits regarding claims released by the Settlement, unless and until such Class Members have filed  
3 valid Requests for Exclusion with the Settlement Administrator.

4 15. Counsel for the parties are hereby authorized to utilize all reasonable procedures in  
5 connection with the administration of the Settlement which are not materially inconsistent with  
6 either this Order or the terms of the Settlement.

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8 **IT IS SO ORDERED.**



DATED: 02/24/2026

By: Theresa M. Traber / Judge  
JUDGE OF THE SUPERIOR COURT