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7 Attorneys for Plaintiff Martha Carballo  
and the Proposed Class

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF MARIN**

10 MARTHA CARBALLO, individually, and  
11 on behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 THE WOODLANDS STORE HOLDINGS,  
15 INC., a California Corporation; THE  
16 WOODLANDS STORE, INC., an unknown  
17 business entity; THE WOODLANDS  
18 STORE, LLC, a California limited liability  
19 company; and DOES 1 through 10,  
inclusive,

20 Defendants.

Case No.: CV0005220

Assigned for All Purposes to:  
Hon. Mark A. Talamantes, Courtroom L

**~~PROPOSED~~ ORDER GRANTING  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Hearing Information:

Date: ~~TBD~~ 4/17/2026  
Time: ~~TBD~~ 1:30 p.m.  
Courtroom: L

**FILED**

APR 17 2026

*P. Okubo*  
JAMES M. KIM, Court Executive Officer  
MARIN COUNTY SUPERIOR COURT  
By: P. Okubo, Deputy

1 PLEASE TAKE NOTICE THAT on April 17, 2026 at 1:30, the Motion for Preliminary  
2 Approval of Class Action Settlement filed by Plaintiff Martha Carballo ("Plaintiff"), on behalf of  
3 herself and a Settlement Class, and not opposed by Defendant THE WOODLANDS STORE  
4 HOLDINGS, INC. ("Defendant"), came on for hearing in Courtroom L of the Marin County Superior  
5 Court, located at 3501 Civic Center Drive San Rafael, CA 94903.

6 After full consideration of the evidence, the pleadings and papers filed by the parties in  
7 connection therewith, arguments of counsel and all other matters presented to the Court, and good  
8 cause having been shown, IT IS HEREBY ORDERED that Plaintiff's Motion for Preliminary  
9 Approval of Class Action Settlement is GRANTED based on the conditions below.

10 NOW, THEREFORE, IT IS HEREBY ORDERED:

11 1. This Order incorporates by reference the definitions in the Settlement Agreement  
12 ("Agreement" or "Settlement Agreement"), and all terms defined therein shall have the same  
13 meaning in this Order as set forth in the Settlement Agreement attached as Exhibit 1 to the  
14 Declaration of Tiffany Hyun filed concurrently herewith.

15 2. The Court recognizes that the parties stipulate and agree to certification of a class  
16 for settlement purposes only. For settlement purposes only, the Court conditionally certifies the  
17 following settlement class (the "Class Members" or "Settlement Class"): "all current and former  
18 hourly employees employed by Defendant in California who were classified as non-exempt  
19 during the Class Period." The "Class Period" means the period from January 27, 2021 through  
20 August 20, 2025.

21 3. The Class also includes "Aggrieved Employees," which is defined as "current and  
22 former hourly employees employed by Defendant in California who were classified as non-exempt  
23 during the PAGA Period." "PAGA Period" means the period from January 27, 2024 through  
24 August 20, 2025.

25 4. The Court finds, for settlement purposes only, the requirements of California Code  
26 of Civil Procedure section 382 are satisfied. The term "Participating Class Member" means a Class  
27 Member who has not requested exclusion from the Settlement.  
28

1           5.       Plaintiff is hereby appointed and designated, for all purposes, as the representative  
2 of the class, and the following attorneys are hereby appointed and designated as counsel for  
3 Plaintiff and the Class ("Class Counsel"):

4  
5                   Seung Yang (SBN 249857)  
6                   seung.yang@thesentinelfirm.com  
7                   Tiffany Hyun (SBN 311743)  
8                   tiffany.hyun@thesentinelfirm.com  
9                   Jeffrey Jackson (SBN 290364)  
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17                  Facsimile: (213) 985-2155

18 Class Counsel is authorized to act on behalf of Class Members with respect to all acts or consents  
19 required by, or which may be given pursuant to, the Settlement, and such other acts reasonably  
20 necessary to consummate the Settlement. Any Class Member may enter an appearance through  
21 counsel of such Class Member's own choosing and at such Class Member's own expense. Any Class  
22 Member who does not enter an appearance or appear on his or her own will be represented by Class  
23 Counsel.

24           6.       The Court hereby approves on a preliminary basis the Settlement Agreement as  
25 appearing on its face to be fair, reasonable, and adequate and to have been the product of serious,  
26 informed, and extensive negotiations among Plaintiff, Defendants, and their respective counsel.

27           7.       A final approval hearing shall be held before this Court on [a date at least 150 days  
28 from date this Order is signed] 9/18/2026, at 1:30 in Courtroom L of the Marin  
County Superior Court, located at 3501 Civic Center Drive San Rafael, CA 94903, to determine  
all necessary matters concerning the Settlement, including: whether the proposed settlement of the  
Action on the terms and conditions provided for in the Settlement Agreement is fair, adequate and

1 reasonable and should be finally approved by the Court; whether a Judgment, as provided in the  
2 Settlement, should be entered herein; whether the plan of allocation contained in the Settlement  
3 Agreement should be approved as fair, adequate and reasonable to the Class Members; and to  
4 finally approve Class Counsels' Fees and Costs Award, the Class Representative Enhancement  
5 Payments, the PAGA payment to the LWDA and the settlement administration expenses. The  
6 Final Approval hearing may be continued without further notice.

7 8. The Parties shall file a Motion for Final Approval on or before sixteen (16) court  
8 days prior to the hearing.

9 9. The Court hereby appoints Apex Class Action Administration as Settlement  
10 Administrator and hereby directs the Settlement Administrator to mail or cause to be mailed to  
11 Class Members (including the Aggrieved Employees) the Notice by first class mail within fourteen  
12 (14) calendar days after the receipt of the Class Data from Defendant using the procedures set forth  
13 in the Settlement Agreement. Class Members who do not opt out of the non-PAGA portion of the  
14 settlement will become Participating Class Members and will automatically receive their  
15 Individual Settlement Payment.

16 10. The Court hereby approves, as to form and content, the Notice of Class Action  
17 Settlement and Hearing Date for Final Court Approval attached as **Exhibit 4** to the Declaration of  
18 Tiffany Hyun filed concurrently herewith. The Court finds that the distribution of the Notice of  
19 Class Action Settlement substantially in the manner and form set forth in the Settlement  
20 Agreement and this Order meets the requirements of due process, is the best notice practicable  
21 under the circumstances, and shall constitute due and sufficient notice to all persons entitled  
22 thereto.

23 11. The Court reserves the right to adjourn or continue the date of the final approval  
24 and all dates provided for in the Settlement Agreement without further notice and retains  
25 jurisdiction to consider all further applications arising out of or connected with the proposed  
26 Settlement.

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IT IS SO ORDERED.

Dated: 4/17/26

  
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JUDGE OF THE SUPERIOR COURT

**MARK A. TALAMANTES**