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FILED

MAR - 2 2026

CLERK OF THE SUPERIOR COURT
BY: K. MIRANDA, DEPUTY CLERK

Attorneys for PLAINTIFF CHARLES ROBBINS,
on behalf of himself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SHASTA**

CHARLES ROBBINS, on behalf of himself
and others similarly situated,

PLAINTIFF,

vs.

ADVANCED CRISIS SOLUTIONS, INC.;
and DOES 1 to 100, Inclusive,

DEFENDANTS

Case No.: 24CV-0204925

CLASS ACTION

*[Assigned for all purposes to the Hon. Benjamin
L. Hanna of Dept 63 for all purposes]*

OUT
[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Declaration of Stephen M. Sloane in
Support Thereof]*

Hearing Information:

Date:

Time:

Dept.: 63

Reservation Number:

By Fax

1 The Motion for Preliminary Approval of a Settlement came before this Court on that on
2 February 2, 2026 at 8:30 a.m. or as soon thereafter as the matter can be heard in Department 63 of
3 the Shasta County Superior Court – Civil Division located at 1515 Court Street, Room 110,
4 Redding, CA 96001. The Court, having considered the proposed Class Action and PAGA
5 Settlement Agreement (“Settlement” or “Settlement Agreement”) and Class Notice entered into by
6 and between Plaintiff Charles Robbins (“Plaintiff”) and Defendant Advanced Crisis Solutions, Inc.
7 (“Defendant”), attached as Exhibit 1 ^{~ Supplemental} to the Declaration of Stephen M. Sloane in Support of
8 Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and the Exhibits attached
9 thereto (hereafter collectively, the “Settlement” or “Settlement Agreement”); having considered the
10 Motion for Preliminary Approval of Class Action Settlement filed by the parties; having considered
11 the respective points and authorities and declarations submitted by the parties in support thereof;
12 and good cause appearing, HEREBY ORDERS THE FOLLOWING:

13 The Court grants preliminary approval of the settlement as set forth in the Settlement and
14 finds the terms to be within the range of reasonableness of a settlement that ultimately could be
15 granted approval by the Court at the Final Fairness Hearing. For purposes of the Settlement, the
16 Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
17 defined community of interest among the Class in questions of law and fact. Therefore, for
18 settlement purposes only, the Court grants conditional certification of the following “Class” defined
19 as follows:

20 All current and former hourly, non-exempt employees of Defendant who worked for
21 Defendant Advanced Crisis Solutions, Inc. (“Defendant”) in the State of California at any time
22 during the Class Period.

23 1. The “Class Period” is the period from period from May 6, 2020 through October 25,
24 2025.

25 2. For purposes of settlement, the Court further designates named Plaintiff Charles
26 Robbins Class Representative, and Joseph Lavi, Vincent Granberry, Chloe J. Sykes, Stephen M.
27 Sloane of Lavi & Ebrahimian, LLP as Class Counsel.

28 3. The Court appoints Apex Class Action Administration as the Settlement

1 Administrator.

2 4. A final fairness hearing on the question of whether the proposed settlement should
3 be finally approved as fair, reasonable and adequate as to the members of the Class is scheduled in
4 Department 63 of the Shasta County Superior Court – Civil Division located at 1515 Court Street,
5 Room 110, Redding, CA 96001, on November 16, 2026, at 8:30 a.m.

6 5. At the final fairness hearing, the Court will consider: (a) whether the settlement
7 should be approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting
8 approval of the settlement should be entered; and (c) whether Plaintiff's application for an award of
9 Class Counsel Fees, Class Counsel Expenses, and Class Representative Service Payment should be
10 granted.

11 6. Counsel for the parties shall file memoranda, declarations, or other statements and
12 materials in support of their request for final approval by no later than 16 court days prior the final
13 fairness hearing.

14 7. Class Counsel shall file a motion for an award of Class Counsel Fees Payment,
15 Class Counsel Litigation Expenses Payment, and Class Representative Service Payment by no later
16 than 16 court days prior to the final fairness hearing.

17 8. The Court approves, as to form and content, the Class Notice which is attached to
18 the Settlement as Exhibit 1.

19 9. No later than fifteen (15) calendar days following the date the Court enters this
20 order, Defendant shall provide the following information to the Settlement Administrator: Class
21 Member identifying information in Defendant's possession including the Class Member's name,
22 last-known mailing address, ~~Social Security number~~, and number of Class Period Workweeks and
23 PAGA Pay Periods ("Class Data").

24 10. No later than fourteen (14) calendar days after receiving the Class Data, the
25 Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in
26 the Class Data by first-class U.S. Mail.

27 11. Class Members shall have ~~forty-five (45)~~ sixty (60) calendar days from the date the
28 Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for

1 Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement (“Response
2 Deadline”). Class Members to whom Notice Packets are resent after having been returned
3 undeliverable to the Administrator shall have an additional fourteen (14) calendar days beyond
4 the Response Deadline has expired.

5 12. The Court finds that the forms of Class Notice to the Class regarding the pendency
6 of the action and of this settlement, and the methods of giving notice to members of the Class
7 constitute the best notice practicable under the circumstances and constitute valid, due, and
8 sufficient notice to all members of the Class. They comply fully with the requirements of
9 California Code of Civil Procedure section 382, California Civil Code section 1781, California
10 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other
11 applicable law.

12 13. The Court further approves the procedures for Class Members to participate in, opt
13 out of, or object to the Settlement, as set forth in the Settlement Agreement and Class Notice.

14 14. Class Members who wish to exclude themselves (opt-out of) the Class Settlement
15 must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not
16 later than 45 days after the Administrator mails the Class Notice (plus an additional 14 days for
17 Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class
18 Member or his/her representative that reasonably communicates the Class Member’s election to
19 be excluded from the Settlement and includes the Class Member’s name, address and email
20 address or telephone number. To be valid, a Request for Exclusion must be timely faxed, emailed,
21 or postmarked by the Response Deadline.

22 15. Participating Class Members may send written objections to the Administrator, by
23 fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire
24 an attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A
25 Participating Class Member who elects to send a written objection to the Administrator must do
26 so not later than 45 days after the Administrator’s mailing of the Class Notice (plus an additional
27 14 days for Class Members whose Class Notice was re-mailed).

1 16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings
2 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
3 Order, are stayed.

4 17. 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.

7 18. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Database	15 calendar days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 calendar days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	15 45 calendar days after the date of mailing of the Class Notice
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancement.	16 court days prior to the final fairness hearing
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 court days prior to the final fairness hearing
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	

20 19. The Fairness Hearing and related prior deadlines set forth above may, from time to
21 time and without further notice to the Class (except those who have filed timely and valid
22 objections), be continued or adjourned by Order of the Court.

23
24 **IT IS SO ORDERED.**

25
26 Dated: MAR - 2 2026

BENJAMIN L. HANNA

Hon. Benjamin L. Hanna,
Judge of the Superior Court

27
28 [PROPOSED] ORDER
BLSY