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FILED
SUPERIOR COURT
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

JUN 23 2026

BY Jennifer Medina
JENNIFER MEDINA, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO**

CHEZARE CHAVERS, individually and on
behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General,

Plaintiff,

vs.

SOUTHWEST MOBILE STORAGE, INC.,
an Arizona corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2402931

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

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~~PROPOSED~~ ORDER

The Motion of Plaintiff Chezare Chavers ("Plaintiff") for Preliminary Approval of Class Action and PAGA Settlement ("Motion") came on regularly for hearing before this Court. The Court, having considered the proposed Joint Stipulation of Class Action and PAGA Settlement attached as **Exhibit 3** to the Declaration of Kristy Connolly ("Settlement Agreement" or "Settlement"), filed concurrently with the Motion and the declaration itself, having considered Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement, memorandum of points and authorities in support thereof, and other supporting documents; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

1. The Court GRANTS preliminary approval of the class 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 approval by the Court at a Final Approval hearing. All terms used herein shall have the same meaning as defined in the Settlement Agreement. For purposes of the Settlement only, the Court finds that the proposed Class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following settlement Class:

All current and former non-exempt employees of Southwest Mobile Storage, Inc. that worked for Southwest Mobile Storage, Inc. in the State of California at any time between March 13, 2020, and December 31, 2025.

2. For purposes of the Settlement only, the Court designates Plaintiff as the Class Representative and designates Protection Law Group, LLP, as Class Counsel.

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

4. The parties are ordered to implement the Settlement according to the terms of the Settlement Agreement.

1 5. The Court approves, as to form and content, the Notice of Proposed Class Action
2 Settlement and Final Approval Hearing ("Notice of Settlement") attached as **Exhibit A** to the
3 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 Approval
14 hearing are intended to ensure the efficient administration of justice and the orderly presentation
15 of any Class Member's objection to the Settlement, in accordance with the due process rights of
16 all Class 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 60 days' notice for Class Members to submit
20 disputes, opt-out of, or object to the Settlement.

21 10. The hearing on Plaintiff's 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 Courtroom S24 of this Court, located at 247 West Third Street, San Bernardino, CA 92415, on
24 11/17/26, 2026 at 9:00 a.m.

25 11. At the Final Approval 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 Plaintiff's 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 Plaintiff's application for service and
5 release awards, settlement administration costs, Class Counsel's attorneys' fees and costs, prior to
6 the hearing on Plaintiff's 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:

9 Event	Date
10 Defendant to provide class contact information to 11 Settlement Administrator no later than:	[14 days following preliminary 12 approval]
13 Settlement Administrator to mail the Notice of 14 Settlement to the Class no later than:	[7 days following provision of 15 contact information]
16 Deadline for Class Members to submit disputes, request 17 exclusion from, or object to the Settlement:	[60 days after mailing of the 18 Notice of Settlement]
19 Deadline for Plaintiffs to file Motion for Final Approval 20 of Class Action Settlement:	[16 court days before the Final 21 Approval Hearing]
22 Hearing on Motion for Final Approval of Settlement 23 (suggested date October 27, 2026) 24	<u>November 17, 2026</u> 25

26 14. Pending the Final Approval 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.**

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10 DATED: JUN 23 2026

11 By: 

JUDGE OF THE SUPERIOR COURT

12 CARLOS M. CABRERA, Judge
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