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(Additional Counsel Following After Caption)

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

MICHAEL PAYNE, an individual, on behalf of
himself, the State of California, as a private
attorney general, and on behalf of all others
similarly situated,

Plaintiff,

v.

REACH AIR MEDICAL SERVICES, LLC, a
California Limited Liability Company; and
DOES 1 TO 50,

Defendant.

Case Number: 24CV008383

~~[Proposed]~~ **Order Granting Preliminary
Approval of Class Action and PAGA
Settlement**

Hearing Date: July 24, 2026

Hearing Time: 9:00 a.m.

Department: 22

Judge: Hon. Lauri A. Damrell

Complaint Filed: April 29, 2024

FAC Filed: July 1, 2024

Trial Date: None Set

RESERVATION ID: A-08383-001

BROOKE SOMMERDORF, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

REACH MEDICAL HOLDINGS, LLC;
REACH AIR MEDICAL SERVICES, LLC;

Case Number: 24CV010355

Complaint Filed: May 24, 2024

FAC Filed: September 12, 2024

Trial Date: None Set

CALSTAR AIR MEDICAL SERVICES LLC;
and DOES 1–50, inclusive,

Defendants.

1 **THE OTTINGER FIRM, P.C.**

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8 Attorneys for Plaintiffs, the Putative Class, and the Aggrieved Employees

1 **~~[PROPOSED]~~ ORDER ON MOTION FOR PRELIMINARY APPROVAL**

2 This matter came for hearing July 24, 2026, at 9:00 a.m., regarding Plaintiffs' unopposed
3 *Motion for Preliminary Approval of Class Action and PAGA Settlement* (the "Motion") on the terms
4 set forth in the parties' *Settlement Agreement and Release of Class and PAGA Actions* (the "Settlement
5 Agreement") attached as **Exhibit A** to the concurrently filed *Declaration of Kyle D. Smith in Support*
6 *of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement* ("Declaration of
7 Kyle D. Smith"). Having considered the Settlement Agreement, all papers and proceedings held herein,
8 and having reviewed the entire record in this action, the Court hereby finds and orders:

9 1. All terms used in this order shall have the same meaning as defined in the Motion.

10 2. The Court grants preliminary approval of the Settlement Agreement and the "Class" (as
11 that term is defined in the Motion) based on the terms set forth in the Settlement Agreement.

12 3. The resolution set forth in the Settlement Agreement appears to be fair, adequate, and
13 reasonable to the Class, including the payment of the non-reversionary gross settlement amount of
14 **\$2,000,000.00** ("Gross Settlement Amount") by Defendants.

15 4. The Settlement Agreement, including the Gross Settlement Amount, falls within the
16 range of reasonableness and is presumptively valid, subject only to any objections that may be raised
17 at the final fairness hearing and final approval by this Court.

18 5. The Settlement, including the PAGA Payment amount, is fair, reasonable, and adequate
19 in view of PAGA's purposes and merits approval under California Labor Code section 2699,
20 subdivision (s)(2).

21 6. A final fairness hearing on the question of whether the proposed Settlement Agreement,
22 the attorneys' fees and costs to counsel, and Plaintiffs' service awards should be finally approved as
23 fair, reasonable, and adequate as to the members of the Class is scheduled in this department on the
24 date and time set forth in the implementation schedule below.

25 7. This Court approves, as to form and content, the ~~proposed class notice and share forms~~
26 ~~attached as Exhibit 1 and Exhibit 2 to the Settlement Agreement~~ ("Class Notice") to be distributed to
27 the Class Members pursuant to the Settlement Agreement in substantially the same form. The Court
28

1 approves the procedure for Class Members to participate in, to opt out of, and to object to the settlement
2 as set forth in the Settlement Agreement.

3 8. The Court directs the mailing of the Class Notice by first class mail to the Class
4 Members in accordance with the implementation schedule set forth below. The Court finds the dates
5 selected for the mailing and distribution of the Class Notice, as set forth in the implementation schedule,
6 meet the requirements of due process and constitute the best notice practicable under the circumstances
7 and due and sufficient notice to all persons entitled thereto.

8 9. The Court preliminarily certifies the Class, as defined in the Motion, for settlement
9 purposes.

10 10. The Court confirms Michael Payne and Brooke Sommerdorf ("Plaintiffs") as class
11 representatives for settlement purposes.

12 11. The Court confirms Jonathan Melmed, Kyle D. Smith, and Jaqueline Antillón of
13 Melmed Law Group P.C. and Robert W. Ottinger of The Ottinger Firm, P.C. as class counsel.

14 12. The Court appoints Apex Class Action, LLC as the settlement administrator.

15 13. The Court orders the following implementation schedule for further proceedings:

17 a.	Deadline for Defendant to Submit Class List to the Settlement Administrator	Within fourteen (14) calendar days of this order.
18 b.	Deadline for Settlement Administrator to Mail Notice Packets to all Class Members	Within twenty-eight (28) calendar days of this Order.
19 c.	Deadline for Class Members to Postmark Workweeks Challenges	Within forty-five (45) days after mailing of the Class Notice, subject to an extension of up to 14 days for Class Members whose notices are remailed.
20 d.	Deadline for Class Members to Postmark Requests for Exclusion	Within forty-five (45) days after mailing of the Class Notice, subject to an extension of up to 14 days for Class Members whose notices are remailed.
21 e.	Deadline for Class Members to Submit Any Objections to Settlement	Within forty-five (45) days after mailing of the Class Notice, subject to an extension of up to 14 days for Class Members whose notices are remailed.

f.	Deadline for Settlement Administrator to Provide Class Counsel with Declaration of Due Diligence	At least twenty-one (21) calendar days prior to the deadline for Plaintiffs' motion for final approval to be filed.
g.	Final Approval and Fairness Hearing	January 8, 2027, _____ at 9:00 a.m./p.m. (Any date on or after November 23, 2026)

14. If any of the dates in this implementation schedule fall on a weekend, bank or court holiday, the time to act shall be extended to the next business day.

IT IS SO ORDERED.

Dated: 08/07/2026



HON. LAURI A. DAMRELL

Judge of the Superior Court, County of Sacramento

