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Attorney for Plaintiff,
Raquel Chavez, on behalf of herself and all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF MONTEREY

RAQUEL CHAVEZ, on behalf of herself and
all others similarly situated, and on behalf of
the general public,

Plaintiff,

vs.

CONSTANT STAFFING, LLC, a
Pennsylvania Limited Liability Company,
NATIONAL CUSTOM PACKING, INC., a
California Corporation, and DOES 1 through
10, inclusive.

Defendants.

CASE NO.: 24CV004236

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

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

IT IS HEREBY ORDERED:

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiff Raquel Chavez as Class Representative;
3. The Court grants preliminary approval of Otkupman Law Firm, A Law Corporation, as Class Counsel;
4. The Court grants preliminary approval of Settlement of claims as set forth in the Amended Class Action and PAGA Settlement Agreement (“Settlement Agreement”);
5. The Court approves the proposed revised Class Notice and the proposed Exclusion Form;
6. The Court grants preliminary approval of the Gross Settlement Amount of One Hundred Fifty Thousand Dollars (\$150,000.00);
7. The Court grants preliminary approval of Apex Class Action, LLC (“Apex”) as Settlement Administrator and payment of service in an amount up to Ten Thousand Dollars (\$10,000.00) from the Gross Settlement Amount;
8. The Court grants preliminary approval of a Class Representative Enhancement Payment to Plaintiff Raquel Chavez in an amount up to Ten Thousand Dollars (\$10,000.00) from the Gross Settlement Amount; By the time of the Final Approval hearing, the Court will decide whether the \$10,000 award is justified and whether the request should be granted.
9. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney’s fees of Fifty Two Thousand Five Hundred Dollars (\$52,500.00), and costs up to Twenty Thousand Dollars (\$20,000.00) from the Gross Settlement Amount;
10. The Court grants preliminary approval of the PAGA Payment in the amount of Ten Thousand Dollars (\$10,000.00) from the Gross Settlement Amount. Sixty-five percent (65%) of this amount will be paid to the LWDA and thirty-five percent (35%) of this amount will be paid to the Aggrieved Employees on a pro rata basis.

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1 11. The Court grants the schedule for implementation of the terms of the Settlement Agreement
2 and the Court sets a hearing on final approval on April 2, 2027 at
3 8:30 a.m./p.m. in Department 14.

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6 DATED: August 14, 2026


HON. JUDGE OF THE SUPERIOR COURT
Ian A. Rivamonte