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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF MERCED

GILBERTO CERNA, individually and on behalf of others similarly situated, and as an aggrieved employee and Private Attorney General, Plaintiff, vs. VALLEY AG LAND MANAGEMENT, a California corporation; GREEN VALLEY LABOR INC., a California corporation; and DOES 1 through 50, inclusive, Defendants.	Case No.: 24CV-02108 *Assigned For All Purposes To: The Hon. Stephanie Jamieson, Dept. 8* **~~[PROPOSED]~~ ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Complaint Filed: May 9, 2024 FAC Filed: July 19, 2024 Trial Date: Not Set

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~~[PROPOSED]~~ ORDER

The Motion of Plaintiff Gilberto Cerna ("Plaintiff") for Preliminary Approval of Class Action and PAGA Settlement ("Motion") came regularly for hearing before this Court. The Court, having considered the proposed Joint Stipulation of Class Action and PAGA Settlement ("Settlement Agreement" or "Settlement"), attached as Exhibit 2 to the Declaration of Heather Davis having considered Plaintiff's Motion for Preliminary Approval of Class Action Settlement, memorandum of points and authorities in support thereof, and supporting declaration filed therewith; 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 hourly-paid, non-exempt employees of Valley Ag Land Management who were employed in the State of California at any time between May 9, 2020, and August 17, 2025, (the "Class Period) and all current and former non-exempt employees of Green Valley Labor, Inc. who performed work for Valley Ag Land Management in the State of California at any time during the Class Period.

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.

5. The Court approves, as to form and content, the proposed Notice of Class Action Settlement ("Notice"), attached to the Settlement Agreement as Exhibit A.

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6. The Court finds that the form of notice to the Class regarding the pendency of the action and of the Settlement, the dates selected for mailing and distribution, and the methods of giving notice to members of the Class, satisfy the requirements of due process, constitute the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all members of the Class. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure § 382, California Civil Code § 1781, California Rules of Court §§ 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

7. The Court further approves the procedures for Class Members to opt-out of or object to the Settlement, as set forth in the Notice and the Settlement Agreement. The procedures and requirements for filing objections in connection with the Final Approval hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Class Member's objection to the Settlement, in accordance with the due process rights of all Class Members.

8. The Court directs the Settlement Administrator to mail the Notice to the members of the Class in accordance with the terms of the Settlement.

9. The Notice shall provide 45 calendar days' notice for Class Members to submit disputes, opt-out of, or object to the Settlement.

10. The hearing on Plaintiff's Motion for Final Approval of Settlement on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 8 of this Court, located at 627 W 21st Street, Merced, CA 95340, on 2/19/27, at 8:15 a.m.

11. At the Final Approval hearing, the Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for an enhancement payment, settlement administration costs, and Class Counsel's attorney's fees and costs, should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of Plaintiff's application for an enhancement

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payment, settlement administration costs, Class Counsel's attorneys' fees and costs, prior to the hearing on Plaintiff's Motion for Final Approval of Settlement according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	**Date**
Defendant to provide class contact information to Settlement Administrator no later than:	[14 days following preliminary approval]
Settlement Administrator to mail the Notice to the Class no later than:	[7 days following provision of contact information]
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	[45 days after mailing of the Notice]
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	[16 court days before the Final Approval Hearing]
Hearing on Motion for Final Approval of Settlement (suggested hearing date: February 2, 2027)	

14. Pending the Final Approval hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

15. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

IT IS SO ORDERED.

DATED: 10/23/2026 By: _____
JUDGE OF THE SUPERIOR COURT