E-Served: Oct 23 2026 3:57PM PDT Via Case Anywhere

Electronically Received 10/21/2026 02:59 PM

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Attorneys for Plaintiff JENNIFER MARURE PEREZ

FILED
Superior Court of California
County of Los Angeles
10/22/2026
David W. Slayton, Executive Officer / Clerk of Court
By: L. Ennis Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JENNIFER MARURE PEREZ, individually, and on behalf of all others similarly situated, and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act ("PAGA");

Plaintiff,

vs.

ADVANCED PURIFICATION ENGINEERING CORPORATION, a California corporation; CULLIGAN INTERNATIONAL COMPANY, a Delaware Corporation; and DOES 1 through 10, inclusive,

Defendants

Case No.: 25STCV18940

Assigned for All Purposes to:
Hon. Samantha P. Jessner, Dept. 7

[REVISED ~~PROPOSED~~] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Hearing Information:

Date: October 21, 2026
Time: 10:00 a.m.
Dept.: 7

PLEASE TAKE NOTICE THAT on October 21, 2026, at 10:00 a.m., the Motion for Preliminary Approval of Class Action Settlement filed by Plaintiff Jennifer Marure Perez ("Perez"), on behalf of herself and a Settlement Class, and not opposed by Defendants Advanced Purification Engineering Corporation, and Culligan International Company ("Defendants"), came on for hearing in Department 7 of the Los Angeles County Superior Court, located at 312 North Spring Street Los Angeles, CA 90012. After full consideration of the evidence, the pleadings and papers filed by the parties in connection therewith, arguments of counsel and all other matters presented to the Court, and good cause having been shown, IT IS HEREBY ORDERED that Plaintiff's Motion for Preliminary Approval of Class Action Settlement is GRANTED based on the conditions below.

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. This Order incorporates by reference the definitions in the Settlement Agreement ("Agreement" or "Settlement Agreement") and the Addendum to the Settlement Agreement ("Addendum"), and all terms defined therein shall have the same meaning in this Order as set forth in the Settlement Agreement attached as **Exhibit 1** to the Supplemental Declaration of Tiffany Hyun filed on October 14, 2026 and as set forth in the Addendum attached as **Exhibit 2** to the Supplemental Declaration of Tiffany Hyun.

2. The Court recognizes that the parties stipulate and agree to certification of a class for settlement purposes only. For settlement purposes only, the Court conditionally certifies the following settlement class (the "Class Members" or "Settlement Class"): "All persons employed by Defendant Advanced Purification Engineering Corporation as non-exempt, hourly-paid employees in the State of California at any time during the Class Period." The "Class Period" means the period of June 27, 2021 through April 27, 2026.

3. The Class also includes "Aggrieved Employees," which is defined as "all persons employed by Defendant Advanced Purification Engineering Corporation as non-exempt, hourly-paid employees in the State of California at any time during the PAGA Period." The "PAGA Period" means the period from June 27, 2024 through April 27, 2026.

4. The Court finds, for settlement purposes only, the requirements of California Code of Civil Procedure section 382 are satisfied. The term "Participating Class Member" means a

Class Member who does not submit a valid and timely opt-out of the Settlement.

5. Plaintiff is hereby appointed and designated, for all purposes, as the representative of the class, and the following attorneys are hereby appointed and designated as counsel for Plaintiff and the Class ("Class Counsel"):

Seung Yang (SBN 249857)
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Tiffany Hyun (SBN 311743)
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Jeffrey Jackson (SBN 290364)
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Class Counsel is authorized to act on behalf of Class Members with respect to all acts or consents required by, or which may be given pursuant to, the Settlement, and such other acts reasonably necessary to consummate the Settlement. Any Class Member may enter an appearance through counsel of such Class Member's own choosing and at such Class Member's own expense. Any Class Member who does not enter an appearance or appear on his or her own will be represented by Class Counsel.

6. The Court hereby approves on a preliminary basis the Settlement Agreement as appearing on its face to be fair, reasonable, and adequate and to have been the product of serious, informed, and extensive negotiations among Plaintiff, Defendants, and their respective counsel.

7. A final approval hearing shall be held before this Court on March 30, 2027 at 10:00 a.m., in Department 7 of the Los Angeles County Superior Court, located at 312 North Spring Street Los Angeles, CA 90012, to determine all necessary matters concerning the Settlement, including: whether the proposed settlement of the Action on the terms and conditions provided for in the Settlement Agreement is fair, adequate and reasonable and should be finally approved by

the Court; whether a Judgment, as provided in the Settlement, should be entered herein; whether the plan of allocation contained in the Settlement Agreement should be approved as fair, adequate and reasonable to the Class Members; and to finally approve Class Counsels' Fees and Costs Award, the Class Representative Service Payment, the PAGA payment to the LWDA and the settlement administration expenses. The Final Approval hearing may be continued without further notice.

8. The Parties shall file a Motion for Final Approval on or before sixteen (16) court days prior to the hearing.

9. The Court hereby appoints Apex Class Action, LLC as Settlement Administrator and hereby directs the Settlement Administrator to mail or cause to be mailed to Class Members (including the Aggrieved Employees) the Notice by first class mail within fourteen (14) calendar days after the receipt of the Class Data from Defendants using the procedures set forth in the Settlement Agreement. Class Members who do not opt out of the non-PAGA portion of the settlement will become Participating Class Members and will automatically receive their Individual Settlement Payment.

10. The Court hereby approves, as to form and content, the Notice of Class Action Settlement and Hearing Date for Final Court Approval attached as **Exhibit 3** to the Supplemental Declaration of Tiffany Hyun filed on October 14, 2026. The Court finds that the distribution of the Notice of Class Action Settlement substantially in the manner and form set forth in the Settlement Agreement and this Order meets the requirements of due process, is the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons entitled thereto.

11. The Court reserves the right to adjourn or continue the date of the final approval and all dates provided for in the Settlement Agreement without further notice and retains jurisdiction to consider all further applications arising out of or connected with the proposed Settlement.

IT IS SO ORDERED.

Dated: 10/22/2026

Samantha Jessner / Judge

JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; the address from which I served the document listed below is 707 Wilshire Blvd., Suite 4700, Los Angeles, California 90017. On October 21, 2026, I served the foregoing document described as:

[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

☒ **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service CASEANYWHERE.

☒ the written confirmation of counsel in this action:

VEDDER PRICE (CA), LLP
Attorneys for Defendants Advanced Purification Engineering Corporation and Culligan International Company.
Michael A. Wahlander (mwahlander@vedderprice.com)
Lauren E. Wertheimer (lwertheimer@vedderprice.com)
1925 Century Park E Ste 1900,
Los Angeles, CA 90067

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 21, 2026, at Los Angeles, California.

Mellinda Hensley
Name

Signature