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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF IMPERIAL**

JULIA TORRES, JOY OLIVER BANKS,  
and JOSE GOMEZ, in a Representative  
capacity only, and on behalf of other  
members of the general public similarly  
situated

Plaintiffs

v.

MANAGEMENT & TRAINING  
CORPORATION, a Delaware Corporation;  
and DOES 1-10, inclusive

Defendants

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CASE NO. ECU003320

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' *UNOPPOSED* MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: February 9, 2026  
Time: 8:30 a.m.

Dept.: 5  
Judge: Hon. Jeffrey B. Jones

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Plaintiffs JULIA TORRES, JOY OLIVER BANKS, and JOSE GOMEZ 's Unopposed Motion  
3 for Conditional Certification of Settlement Class and Preliminary Approval of Good Faith  
4 Determination of Class Action Settlement, in the above-captioned matter, came on for hearing before  
5 this Court on February 2, 2026 at 8:30 a.m. Sullivan & Yaeckel Law Group, APC appeared on behalf  
6 of Plaintiffs and the Class; Jackson Lewis, appeared on behalf of Defendant. On good cause shown, and  
7 pursuant to the authority of California statutory and case law, this Court finds that the settlement  
8 between Plaintiff and Defendant was made in good faith pursuant to California Rules of Court, rules  
9 3.769 and 3.770. Accordingly, this Court rules as follows:

10 **IT IS HEREBY ORDERED THAT:**

- 11 1. Plaintiffs' Unopposed Motion for Preliminary Approval of the Class Action Settlement is  
12 hereby granted.
- 13 2. Specifically, the Court preliminarily orders as follows:
  - 14 a. Conditionally certifying the following class, which is subject to the Settlement:  
15 all nonexempt employees of MTC in California from October 11, 2022 through  
16 September 10, 2025.
  - 17 b. Appointing Julia Torres, Joy Oliver Banks, and Jose Gomez as Class Representatives.
  - 18 c. Appointing Sullivan & Yaeckel Law Group, APC, Lavi & Ebrahimian, LLP, and Labor  
19 Law PC as Class Counsel.
  - 20 d. Approving as to form and content the proposed Notice of Class Action Settlement.
  - 21 e. Appointing CAC Services, LLC ("CAC") to act as the Settlement Administrator. CAC  
22 is directed to issue—via first-class United States mail—the Notice of Proposed Class  
23 Action Settlement to the proposed Class Members, as specified in the Joint Stipulation  
24 and Settlement of Class Action.
  - 25 f. The settlement class members are provided 30-days from dissemination of the notice  
26 to submit a dispute, object, or opt out of the proposed class action settlement.
  - 27 g. The Settlement is preliminarily approved subject only to the objections of Class  
28 Members and final review by the Court.
  - h. Class Counsel's request for Attorneys' Fees and Costs up to an amount of

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\$490,000.00, and up to \$33,000.00 in costs, is preliminarily approved, subject to the final review of the Court.

- i. The Class Representative enhancement award of \$28,500.00 (\$9,500.00 each) to Julia Torres, Joy Oliver Banks, and Jose Gomez in consideration for serving as Class Representatives is preliminarily approved, subject to final review of the Court.
- 3. The Court will hold a hearing on Plaintiffs' Request for: **(1)** Final Approval of the Settlement; **(2)** Class Representative Enhancement Awards; and **(3)** Attorneys' Fees and Costs, on \_\_\_\_\_ in department 5.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. JEFFREY B. JONES  
JUDGE OF THE SUPERIOR COURT