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Attorneys for Plaintiffs ADRIANA HUERTA and
MARIA SANCHEZ on behalf of themselves and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ADRIANA HUERTA and MARIA SANCHEZ
on behalf of themselves and all others similarly
situated

Plaintiffs,

vs.

PRO-TECH DESIGN & MANUFACTURING,
INC. a California corporation, and DOES 1
through 50, inclusive,

Defendants.

Case No. 19STCV36380
Assigned For All Purposes To:
Judge: Lawrence P. Riff
Dept.: 7

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

WHEREAS, this action is pending before this Court as a putative class and PAGA action
(the "Action"); and

WHEREAS, Plaintiffs, through an unopposed motion for preliminary approval, has
applied to this Court for an order preliminarily approving the settlement of the Action in
accordance with the Class Action and PAGA Settlement Agreement (hereinafter "Settlement

Agreement”), and any exhibit annexed thereto, which sets forth the terms and conditions for a proposed settlement and final resolution of the Action upon the terms and conditions set forth therein; and the Court having read and considered the Settlement Agreement and the exhibit annexed thereto;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. This Order incorporates by reference the definitions in the final version of the Settlement Agreement which has been filed with the Court and all terms defined therein shall have the same meaning in this Order as set forth in the Settlement Agreement;

2. The Court hereby conditionally certifies the Class for settlement purposes only. For the purposes of this settlement, the Class is defined as: all persons employed by PRO-TECH in California and classified as non-exempt who worked for PRO-TECH during the Class Period. The Class Period means the period from October 10, 2015 through September 12, 2022. Should for whatever reason the Settlement not become final, the fact that the Parties were willing to stipulate to class certification as part of the Settlement shall have no bearing on, nor be admissible in connection with, the issue of whether a class should be certified in a non-settlement context;

3. The Court hereby authorizes the retention of Simpluris as Settlement Administrator for the purpose of this Settlement;

4. The Court hereby conditionally finds that James R. Hawkins, Isandra Fernandez and Lance Dacre of the law firm of James Hawkins, APLC, and Joseph Lavi, Esq. of Lavi & Ebrahimian, LLP, may act as counsel for the Class. The Court further conditionally finds that Plaintiffs Adriana Huerta, Maria Sanchez and Estephany Avalos may act as the Class Representatives for the Class;

5. The Court hereby preliminarily APPROVES the proposed Court Approved Notice Of Class Action Settlement and Hearing Date For Final Approval (“Class Notice.” The Court further finds that the Class Notice appears to fully and accurately inform the Class Members of all material elements of the proposed Settlement Agreement, of the Class Members’ right to be excluded from the Class, and of each Class Member’s right and opportunity to object to the

Settlement. The Class Notice shall be mailed to the Class Members as set forth in the Settlement Agreement;

6. The Court finds on a preliminary basis that the Settlement Agreement appears to be within the range of reasonableness of a settlement that could ultimately be given final approval by this Court. It appears to the Court on a preliminary basis that the settlement amount is fair, adequate and reasonable as to all potential Class Members when balanced against the probable outcome of further litigation relating to liability and damages issues. It further appears that investigation and research have been conducted such that counsel for the Parties, at this time, are able to reasonably evaluate their respective positions. It further appears to the Court that settlement at this time will avoid substantial additional costs by all Parties, as well as avoid the delay and risks that would be presented by the further prosecution of the Action. It further appears that the Settlement has been reached as the result of serious and non-collusive, arms-length negotiations;

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

Preliminary approval order.	
Deadline for Defendants to provide the Class Data to the Settlement Administrator.	_____ (within thirty (30) calendar days after Court Grants Preliminary Approval).
Mail notices to Settlement Class Members.	_____ (within fourteen (14) calendar days after Settlement Administrator Receives Class Data from Defendant).
Deadline for postmark by registered mail of any Request for Exclusion.	_____ (forty five (45) days after Settlement Administrator first mails Notice of Class Settlement to Settlement Class Members).

Deadline for receipt by the Settlement Administrator of any objections to the Settlement.	_____ (forty five (45) days after Settlement Administrator first mails Notice of Class Settlement to Settlement Class Members).
Deadline for Class Counsel to file Motion for Final Approval of Settlement.	_____ 2023
Final Fairness and Final Approval Hearing.	_____ 2023 at

IT IS SO ORDERED.

Dated: _____

Hon. Lawrence P. Riff
Judge of the Los Angeles County Superior Court