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Attorneys for Plaintiff CARLA COLLINS
and the certified Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

CARLA COLLINS on behalf of herself, and all
others similarly situated, and all aggrieved
employees,

Plaintiff,

v.

NATIONAL INSURANCE INSPECTION
SERVICES, INC.; and DOES 1 through 50,
inclusive,

Defendants.

Case No: 20STCV15619

CLASS AND REPRESENTATIVE ACTION

Assigned to
Honorable Elaine Lu, Dept. 9

**[PROPOSED] ORDER GRANTING
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: July 10, 2025
Time: 10:00 a.m.
Dept. 9

Complaint Filed: April 22, 2020
FAC Filed: June 24, 2020
Trial: Not Set

1 Plaintiff Carla Collins (“Class Representative” or “Plaintiff”) and National Insurance
2 Inspection Services, Inc. (“Defendant”) entered a “Joint Stipulation of Class and PAGA Action
3 Settlement and Release of Claims” (the “Stipulation”) which, if approved, would resolve this
4 certified class action. Upon review and consideration of the motion papers submitted by the
5 parties, including the Stipulation and all exhibits thereto, the Court determines and orders as
6 follows:

7 1. The Court has jurisdiction over this matter and venue is proper.

8 2. The Court grants provisional certification of the settlement class for
9 settlement purposes only, pursuant to California Code of Civil Procedure Section 382 and
10 California Rule of Court rule 3.763. The settlement Class is defined as follows: “All
11 individuals classified as independent contractors by Defendant who performed inspections in
12 California as real property inspectors at any time between April 22, 2016 and May 30, 2024,
13 inclusive who have not signed release agreements or opt-ed out of the Action.” The “Class
14 Period” refers to the period from and including April 22, 2016 through May 30, 2024. The
15 settlement Class definition and Class Period are coextensive with the Class certified in the
16 January 12, 2024 Rulings/Orders re: Motion for Class Certification (the “Class Certification
17 Order”).

18 3. The Court finds that the term “Aggrieved Individuals” means all current and
19 former real property inspectors who contracted with Defendant in California at any time or times
20 during the PAGA Period. The PAGA Period is from and including April 16, 2019 through
21 January 22, 2025.

22 4. The Court preliminarily approves the proposed settlement as set forth in the
23 Stipulation as within the range of possible final approval.

24 5. The Court reconfirms its appointment of Eric A. Grover and Robert W. Spencer
25 of Keller Grover LLP as Class Counsel.

26 6. The Court reconfirms its appointment of Plaintiff and Class Representative Carla
27 Collins as the Class Representative.

28 7. The Court preliminarily finds, for purposes of this settlement, that the Class

1 Representative and Class Counsel fairly and adequately represent and protect the interests of the
2 absent Class Members.

3 8. The Court approves and appoints Phoenix Settlement Administrators to serve as
4 the Settlement Administrator and directs Phoenix Settlement Administrators to carry out all
5 duties and responsibilities of the Settlement Administrator specified in the Stipulation.

6 9. Pursuant to California Rules of Court rule 3.769, the Court approves the manner
7 of class notice set forth in the Stipulation. The Court approves the form and content of the notice
8 form proposed by counsel, specifically the Notice of Class and PAGA Action Settlement
9 (“Notice”), which is attached to the Stipulation as **Exhibit 1**. The Court finds that the Notice
10 constitutes the best notice practicable under the circumstances and is valid, due and sufficient
11 notice to the Class of the pendency of the action, preliminary certification of the Class, the terms
12 of the settlement, procedures to become a Settlement Class Member (as defined in the
13 Stipulation), procedures for objecting to the settlement, procedures to opt out of the settlement,
14 and the time and place of the Final Approval Hearing. The proposed manner of class notice
15 satisfies the requirements of due process, and complies with applicable law, including California
16 Code of Civil Procedure Section 382 and California Rules of Court rule 3.769.

17 10. No later than 21 calendar days after this Order is entered by the Court, according
18 to the terms set forth in the Stipulation, Defendant shall provide the Settlement Administrator
19 with all of the following information about each Class member in Excel format (the “Class
20 Data”): (i) each Class Member’s full name; (ii) each Class Member’s last-known address; (iii)
21 each Class Member’s Social Security Number; and (iv) the total number of inspections
22 performed by each Class Member during the Class Period.

23 11. No later than 21 calendar days after this Order is entered by the Court, according
24 to the terms set forth in the Stipulation, Defendant shall provide the Settlement Administrator
25 with all of the following information about each Aggrieved Individual in Excel format (the
26 “Aggrieved Individual Data”): (i) each Aggrieved Individual’s full name; (ii) each Aggrieved
27 Individual’s last-known address; (iii) each Aggrieved Individual’s Social Security Number; and
28 (iv) the total number of payments made to each Aggrieved Individual during the PAGA Period.

12. No later than 14 calendar days after receiving the Class Data and Aggrieved Individual Data from Defendant, the Settlement Administrator shall send Class Members and Aggrieved Individuals the Court-approved Notice by first-class mail to their last known addresses. The Settlement Administrator will perform address updates and verifications as necessary prior to the first mailing.

13. If any Notice is returned as undeliverable, the Settlement Administrator shall perform skip-traces on returned mail and will re-mail the Notices to updated addresses (if any) as soon as possible upon return of the undeliverable Notices.

14. Class Members who wish to receive a settlement payment are not required to submit a claim form.

15. Class Members will have the opportunity, should they disagree with the number of Qualified Inspections stated on their Notice, to provide documentation and/or an explanation to show a different number of inspections performed during the Class Period. If there is a dispute, the Settlement Administrator will consult with the Parties to determine whether an adjustment is warranted. The Settlement Administrator shall determine the eligibility for, and the amounts of, any Individual Settlement Payments under the terms of the Stipulation. The Settlement Administrator's determination of the eligibility for and the amount of any Individual Settlement Payment shall be binding upon the Settlement Class Member and the Parties.

16. Any Class Member who seeks exclusion from the Class must send a signed, written request to be excluded from the settlement ("Request for Exclusion") via mail that must be postmarked no later than 45 calendar days after the date that the Settlement Administrator first mailed the Notice (the "Response Deadline"), as described in the Stipulation section III.L.7. The postmark date on the Request for Exclusion envelope shall be the exclusive means used to determine whether the Request for Exclusion was timely submitted. The Request for Exclusion (1) must contain the name, address, and the last four digits of the Social Security Number of the person requesting exclusion; (2) must be signed by the Class Member; (3) must be postmarked by the Response Deadline and returned to the Settlement Administrator at the specified address; and (4) must contain a typewritten or handwritten notice stating, in substance, as follows: "I

wish to opt out of the Settlement of the class action lawsuit entitled *Collins v. NIIS*.”

17. Any Class Member who seeks to object to the settlement must send a written statement of objection (“Notice of Objection”), which must be postmarked no later than 45 calendar days after the date the Settlement Administrator first mails the Notice to Class Members (the Response Deadline), as described in the Stipulation section III.L.8. In order for an objection to be complete, the Notice of Objection must be signed by the Class Member and state (1) the case name and number; (2) the name of the Class Member; (3) the address of the Class Member; (4) the last four digits of the Class Member’s Social Security Number; (5) the basis for the objection and any supporting documents; and (6) whether or not the Class Member intends to appear at the final approval hearing. The failure to submit a written objection does not waive a Settlement Class Member’s right to appear and orally object at the final approval hearing.

18. Plaintiff shall file the motion for final approval of the proposed class and PAGA action settlement and motion applying for awards of attorneys’ fees and costs, the Class Representative Incentive Award/General Release Payment and settlement administration costs and copies of any objections received by no later than 16 court days prior to the date of the Final Approval Hearing.

19. The Final Approval Hearing shall be held on _____, 2025 at _____.m. in Department 9 of the above-entitled Court, located at Spring Street Courthouse, 312 North Spring Street, Los Angeles, California 90012, at which the Court will determine whether the settlement should be finally approved as a fair, reasonable, and adequate to the Class Members; whether the Final Approval Order and Judgment should be entered; whether the PAGA settlement should be approved; whether Class Counsel’s application for attorneys’ fees and expenses should be approved; whether any request for the Class Representative’s service award and general release payment should be approved; and whether the request for the payment of administration costs should be approved.

20. The Court reserves the right to modify the date of the Final Approval Hearing and related deadlines set forth herein. The Final Approval Hearing may be postponed, adjourned or continued by Order of the Court without further notice to the Class.

1 21. Pending the final determination of whether the settlement should be approved, all
2 proceedings in the action, except as necessary to implement the settlement or comply with the
3 terms of the Stipulation or this Order, are hereby stayed.

4 22. In the event the settlement is not finally approved or is terminated, canceled or
5 fails to become effective for any reason, the Parties will be returned to their former positions.

6
7 **IT IS SO ORDERED.**

8
9
10 Dated: _____, 2025

HON. ELAINE LU
JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **April 18, 2025**, in the case of *Collins v. National Insurance Inspection Services, Inc.* Los Angeles Superior Court Case Number 20STCV15619, I served the foregoing document(s):

[PROPOSED] ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE- Case Anywhere) by submitting an electronic version of the documents through the user interface at www.caseanywhere.com and by emailing a word version of the document to the above referenced email addresses.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ