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on behalf of herself and all others similarly situated

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

ANGELICA GARCIA, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

I COLOR PRINTING & MAILING, INC., a
California corporation, and DOES 1 through 50,
inclusive,

Defendants.

Case No. 20STCV16093

ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Kenneth R. Freeman
DEPT: 14

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

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

WHEREAS, Plaintiff, 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 and Class Notice
(“Settlement Agreement”) and any exhibit annexed thereto, which sets forth the terms and

1 conditions for a proposed settlement and final resolution of the Action upon the terms and
2 conditions set forth therein; and the Court having read and considered the Settlement
3 Agreement and the exhibit annexed thereto;

4 NOW, THEREFORE, IT IS HEREBY ORDERED:

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

8 2. The Court hereby conditionally certifies the Class for settlement purposes only.
9 For the purposes of this settlement, the Class is defined as: all current and former employees of
10 I COLOR who worked in the state of California in an hourly, non-exempt capacity at any time
11 between April 24, 2016 through April 29, 2024. Should for whatever reason the Settlement not
12 become final, the fact that the Parties were willing to stipulate to class certification as part of
13 the Settlement shall have no bearing on, nor be admissible in connection with, the issue of
14 whether a class should be certified in a non-settlement context;

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

17 4. The Court hereby conditionally finds that James Hawkins, Isandra Fernandez
18 and Anthony Draper of James Hawkins APLC, may act as counsel for the Class. The Court
19 further conditionally finds that Plaintiff Angelica Garcia may act as the Class Representative
20 for the Class;

21 5. The Court hereby preliminarily APPROVES the proposed Notice of Class
22 Action Settlement and Hearing Date for Final Approval. ("Class Notice") The Court further
23 finds that the Class Notice appears to fully and accurately inform the Class Members of all
24 material elements of the proposed Settlement Agreement, of the Class Members' right to be
25 excluded from the Class, and of each Class Member's right and opportunity to object to the
26 Settlement. The Class Notice shall be mailed to the Class Members as set forth in the
27 Settlement Agreement;
28

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.	_____, 2025
Deadline for Defendants to provide the Class Data to the Settlement Administrator.	_____, 2025 (within fifteen (15) calendar days after Court Grants Preliminary Approval).
Mail notices to Settlement Class Members.	_____, 2025 (within fourteen (14) calendar days after Settlement Administrator Receives Class Data from Defendant).
Response Deadline for postmark by mail, fax or email of any Request for Exclusion.	_____, 2025 (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.	_____ 2025 (forty five (45) days after Settlement Administrator first mails Notice of Class Settlement to Settlement Class Members).
Response Deadline extension for re-mailed notices	_____ 2025 (14 calendar days after Response Deadline expires)
Deadline for Class Counsel to file Motion for Final Approval of Settlement.	_____ 2025
Final Approval Hearing.	_____, 2025, at 11:00 a.m.

IT IS SO ORDERED.

Dated: _____

Hon. Kenneth R. Freeman
Judge of the Los Angeles County Superior Court