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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
15

16 KELSEY JONES, ZOE MUNOZ, CORI
BRATSBY-RUDD, on behalf of
17 themselves and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*,

18 Plaintiffs,

19 v.

20 PEACE OVER VIOLENCE, a California
domestic nonprofit, PATRICIA O.
21 GIGGANS, an individual, and DOES 1
22 through 10, inclusive,

23 Defendants.
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CASE NO: 20STCV39038

*Assigned to the Hon. Yvette M. Palazuelos, Dept.
SSC-9*

CLASS ACTION

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

DATE: June 14, 2022

TIME: 10:00 a.m.

DEPT.: SSC-9

Action Filed: October 13, 2020

1 Plaintiffs Kelsey Jones, Zoe Munoz, and Cori Bratby-Rudd's (collectively, "Plaintiffs")
2 motion for preliminary approval of class action settlement came on for hearing before this Court
3 in Department SSC-9, Judge Yvette M. Palazuelos presiding, on June 14, 2022. The Court,
4 having considered the papers submitted in support of the motion and having heard oral argument
5 of the parties, **HEREBY ORDERS THE FOLLOWING:**

6 1. The Court grants preliminary approval of the settlement based upon the terms set
7 forth in the Joint Stipulation of Class Action and Representative Action Settlement ("Settlement
8 Agreement") filed with the Court. The settlement appears to be fair, adequate, and reasonable to
9 the class;

10 2. The settlement falls within the range of reasonableness and appears to be
11 presumptively valid, subject only to any objections that may be raised at the final hearing;

12 3. The Court approves, as to form and content, the Notice of Pendency of Proposed
13 Class Action Settlement and Final Hearing ("Notice") and Request for Exclusion form;

14 4. The Court directs the mailing of the Notice and Request for Exclusion form by
15 first class mail to the Settlement Class Members in accordance with the schedule set forth below.
16 The Court finds that the dates selected for the mailing and distribution of the Notice and Request
17 for Exclusion form, as set forth herein, meet the requirements of due process and provide the best
18 notice practicable under the circumstances and shall constitute due and sufficient notice to all
19 persons entitled thereto;

20 5. It is ordered that the settlement class is preliminarily certified for settlement
21 purposes only. The settlement class is defined as follows: all current and former non-exempt,
22 hourly paid employees who worked in California for Defendants [Peace Over Violence and
23 Patricia O. Giggans] at any time during the Class Period [October 13, 2016 through December 31,
24 2021].

25 6. The Court confirms Daniel F. Gaines, Esq. and Alex P. Katofsky, Esq. of Gaines
26 & Gaines, APLC and Joseph Tojarieh, Esq. of Stonebrook Law as Class Counsel, and grants
27 preliminary approval of an award of attorneys' fees of up to \$45,000 and documented litigation
28 costs of up to \$10,000 to Class Counsel, subject to final approval by the Court following a further

1 motion by Class Counsel;

2 7. The Court confirms Kelsey Jones, Zoe Munoz, and Cori Bratby-Rudd as the Class
3 Representatives and grants preliminary approval to a proposed service payment in an amount not
4 to exceed \$5,000 each (for a total of \$15,000);

5 8. The Court grants preliminary approval of the Private Attorneys General Act
6 payment of \$7,500 to the Labor and Workforce Development Agency;

7 9. The Court hereby approves Simpluris, Inc. as the Settlement Administrator and
8 grants preliminary approval of the payment of fees and other charges of the Settlement
9 Administrator in an amount not to exceed \$4,000; and

10 10. The Court orders the following schedule of dates for the specified actions/further
11 proceedings:

<u>EVENT</u>	<u>TIMING</u>
Last day for Defendant to the Settlement Administrator with information with respect to each Settlement Class Member, including his or her: (1) name, last known address(es) and last known telephone number(s) currently in Defendants' possession, custody, or control; (2) Social Security Number in Defendants' possession, custody, or control; and (3) number of Pay Periods worked during the Class Period and PAGA Period by the Settlement Class Member ("Class List")	10 calendar days after entry of Court's Order granting preliminary approval of Settlement
Last day for Settlement Administrator to mail Notice and Request for Exclusion form to Class Members	7 calendar days after receipt of the Class List
Last day for Class Members to submit a written Request for Exclusion to Settlement Administrator	45 calendar days after the initial mailing of the Class Notice to Class Members
Last day for Class Members to file an Objection with the Court	45 calendar days after the initial mailing of the Class Notice to Class Members
Last day for Class Counsel to file and serve moving papers in support of final settlement approval and request for attorneys' fees and costs	No later than 17 Court days before the final approval hearing.
Last day for Class Counsel to file with the Court and serve declaration by Settlement Administrator specifying the due diligence undertaken with regard to the mailing of the Notice and Request for Exclusion	No later than 17 Court days before the final approval hearing.

<u>EVENT</u>	<u>TIMING</u>
Final settlement approval hearing	_____, 2022, at _____. The Parties suggest the final approval hearing be held approximately 100 days after this preliminary approval order is signed.

Dated: _____

JUDGE OF THE SUPERIOR COURT