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6 Attorneys for Plaintiff Laura Herrera, individually and on behalf of others similarly
situated and other aggrieved employees

7 [ADDITIONAL COUNSEL LISTED AFTER CAPTION]

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

11 LAURA HERRERA, VALERIE
12 CHAVEZ, individually and on behalf of
13 others similarly situated and other
aggrieved employees,

14 Plaintiffs,

15 v.

16 CASCADE LIVING GROUP
17 MANAGEMENT, LLC, an active
Washington Limited Liability Company;
18 BPM SENIOR LIVING COMPANY, an
active Delaware Corporation; and DOES
19 1 through 10,

20 Defendants.

Case No.: 20STCV48606 (related to
21STCV35724)

CLASS AND REPRESENTATIVE
ACTION

*[Assigned to Hon. Stuart M. Rice
in Dept. SS-1]*

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

[FILED CONCURRENTLY WITH
NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL;
DECLARATION OF HAIK
HACOPIAN WITH EXHIBITS;
DECLARATION OF ZORIK
MOORADIAN; DECLARATION OF
JAMES R. HAWKINS;
DECLARATION OF LAURA
HERRERA; AND DECLARATION OF
VALERIE CHAVEZ]

Date: August 14, 2023
Time: 10:30 a.m.
Dept.: SS-1

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10 Attorneys for Plaintiff, VALERIE CHAVEZ
11 on behalf of herself and all others similarly situated
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1 On August 14, 2023, the Court considered the motion of Plaintiff Laura Herrera and
2 Plaintiff Valerie Chavez for preliminary approval of the Parties' proposed class action
3 Settlement.

4 The Court having read and considered the papers on the motion submitted by Class
5 Counsel, having heard the presentation of Class Counsel and Defendant's counsel, having
6 reviewed all of the submissions presented with respect to the proposed Settlement, having
7 carefully considered the requirements for class certification, and having preliminarily
8 determined that the Settlement is fair, adequate, and reasonable, it is hereby ORDERED
9 ADJUDGED, and DECREED that:

10 1. Preliminary Approval of the Class Action Settlement is GRANTED pursuant
11 to Cal. Rules of Court, rule 3.769;

12 2. The Settlement, as set forth in the Stipulated Settlement Agreement
13 ("Settlement Agreement"), is in all respects fair, reasonable, adequate, and in the best interests
14 of the Settlement Class, and it is preliminarily approved. Except as expressly set forth herein,
15 the Parties shall effectuate the Settlement Agreement according to its terms. The Settlement
16 Agreement, and every term and provision thereof, shall be deemed incorporated herein as if
17 explicitly set forth and shall have full force of an Order of this Court;

18 3. The Court finds that the notice plan set forth in the Settlement Agreement
19 constitutes the best notice practicable under the circumstances and shall constitute due and
20 sufficient notice to the Settlement Class of the pendency of the Action, the terms of the
21 Settlement Agreement, the Final Approval Hearing, and satisfies the requirements of
22 California law and federal due process law;

23 4. The proposed Settlement Class is provisionally certified under Civ. Code §
24 382, with the Class consisting of:

25 All current and former non-exempt employees employed by Cascade
26 Living Group, Inc., Cascade Living Group Management, LLC,
Cascade Living Group – Hemet, LLC, or Cascade Living Group –
Grass Valley, LLC, in California during the period starting December
21, 2016 to December 13, 2022. ("Class Period")

5. Plaintiff Laura Herrera and Plaintiff Valerie Chavez are appointed as the Class

Representatives;

6. Zorik Mooradian and Haik Hacopian of Mooradian Law, APC and James R. Hawkins and Isandra Fernandez of James Hawkins APLC are appointed as Class Counsel for the class;

7. CPT Group is appointed as the third-party administrator (“Settlement Administrator”);

8. The proposed settlement of Plaintiffs’ Private Attorneys General Act (the “PAGA”) claims is preliminarily approved;

9. The proposed Class Notice, attached as Exhibit “1” to the Settlement Agreement, is approved and shall be disseminated according to the notice plan described in the Settlement Agreement and substantially in the form submitted;

10. In conformity with the Class Notice, Settlement Class Members wishing to be excluded from the Settlement Class must submit a written request for exclusion requesting exclusion from the Settlement on or before the expiration of the opt out period (60 days after the date that the Class Notice is mailed);

11. In conformity with the Class Notice, any Settlement Class Member who does not opt out of the Settlement may object to the settlement, either personally or through an attorney, orally at the Final Approval Hearing or by providing written notice that the Settlement Class Member is objecting to the Settlement Administrator, which written notice must be postmarked no later than 60 days after the date that the Class Notice is mailed;

12. A Final Approval Hearing will be held on _____, to determine if the proposed settlement should be granted final approval. The Court will hear all evidence and argument necessary to evaluate the Settlement, and will consider Plaintiffs’ request for Class Representative Service Payments, Class Counsel’s request for Attorney’s Fees, Class Counsel’s request for Costs, payment to the LWDA, and payment to the Settlement Administrator. Any Settlement Class Member who complies with the procedures and requirements specified in the Class Notice may appear at the Final Approval Hearing;

13. Class Counsel is to file and serve the Motion for Final Approval of Class

1 Action Settlement and for Awards of Class Representative Service Awards, Attorneys' Fees,
2 Costs, payment to the LWDA, and payment to the Settlement Administrator, by
3 _____; and

4 14. The Court shall retain jurisdiction necessary to effectuate this Order and
5 consider all further applications out of or in connection with the Settlement.
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7 Dated: _____

By: _____
Honorable Stuart M. Rice
Judge of the Superior Court
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