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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF SAN DIEGO**

15 KOREY CURLEY and SCOTT RYAN, on
16 behalf of themselves and other similarly-
17 situated and aggrieved employees,

18 Plaintiffs,

19 vs.

20 PAR WESTERN LINE CONTRACTORS,
21 LLC, a Delaware corporation; PAR
22 ELECTRICAL CONTRACTORS, INC., a
23 Missouri corporation; QUANTA
24 SERVICES, INC., a Delaware corporation;
and DOES 1 through 100,

Case No. 37-2021-00019761-CU-OE-CTL

*[Case assigned for all purposes to the Hon.
Katherine Bacal, Dept. C-63]*

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

Date: November 21, 2025

Time: 1:30 p.m.

Dept.: C-63

Action Filed: May 4, 2021

Trial Date: None Set

1 The Motion of Plaintiffs Korey Curley and Scott Ryan (collectively, “Plaintiffs”) for
2 Preliminary Approval of Class Action Settlement came on regularly for hearing before this Court
3 on November 21, 2025, at 1:30 p.m. This Court, having considered the proposed Stipulation of
4 Settlement (“Settlement Agreement”) attached as Exhibit 1 to the Declaration of Andrew J.
5 Rowbotham filed concurrently herein; having considered Plaintiffs’ Motion for Preliminary
6 Approval of Class and PAGA Action Settlement, Memorandum of Points and Authorities in
7 support thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY
8 ORDERS THE FOLLOWING:

9 1. The Court GRANTS preliminary approval of the class action settlement as set
10 forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement
11 that ultimately could be granted approval by the Court at a Final Approval Hearing. For purposes
12 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable and that
13 there is a sufficiently well-defined community of interest among the members of the Settlement
14 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
15 conditional certification of the following Settlement Class:

16 All employees employed by Defendants PAR Electrical
17 Contractors, Inc., PAR Western Line Contractors, LLC, and Quanta
18 Services, Inc. (collectively, “Defendants”) in California as
19 nonexempt hourly electrical installation employees, Linemen,
 Foremen, and/or any other similar job title or position from May 4,
 2017 through March 10, 2025 (“Class Period”).

20 2. The Settlement Agreement specifies for an attorneys’ fees award not to exceed
21 35% of the Gross Settlement Amount (\$2,940,000.00), an award of litigation expenses incurred
22 not to exceed \$100,000.00, proposed Class Representative Service Awards to Plaintiffs in an
23 amount not to exceed \$20,000.00 (\$10,000.00 to each plaintiff), and PAGA civil penalties in the
24 amount of \$400,000.00 (25% of which, \$100,000.00 will be paid to PAGA Aggrieved
25 Employees). The Court will not approve the amount of attorneys' fees and costs, Service Awards,
26 or PAGA civil penalties, until the Final Approval Hearing.

27 3. For purposes of the Settlement, the Court designates Plaintiffs Korey Curley and
28 Scott Ryan as the Class Representatives, and designates Fletcher W. Schmidt, Paul K. Haines,

Andrew J. Rowbotham, and Susan J. Perez of Haines Law Group, APC, Michael D. Singer and Rosemary Khoury of Cohelan Khoury & Singer, and Brad Nakase of Nakase Law Firm, Inc., as Class Counsel.

4. The Court designates Apex Class Action Administration (“Apex”) as the third-party Settlement Administrator for mailing notices.

5. The Court approves, as to form and content, the Notice of Class Action and PAGA Settlement, Notice of Individual Class Payment, Request for Exclusion Form, and Objection Form (the “Notice Packet”) attached as Exhibit 2 to the Declaration of Andrew J. Rowbotham.

6. The Court finds that the form of notice to the Settlement Class regarding the pendency of the action and of the Settlement, and the methods of giving notice to members of the Settlement Class, constitute the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all of the Class Members. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure § 382, California Civil Code § 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

7. The Court further approves the procedures for the Class Members to opt out of or object to the Settlement, as set forth in the Notice Packet.

8. The procedures and requirements for filing objections in connection with the Final Approval Hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Class Member’s objection to the Settlement in accordance with the due process rights of all members of the Settlement Class.

9. The Court directs the Settlement Administrator to mail the Notice Packet to the members of the Settlement Class in accordance with the terms of the Settlement. The Court directs the Settlement Administrator to carry out all duties as required by the Settlement.

10. No claim form is required for Class Members to receive their settlement payment. The Notice Packet shall provide at least sixty (60) calendar days’ notice for members of the Settlement Class to opt out of, or object to the Settlement. Any Request for Exclusion or Objection shall be submitted directly to the Settlement Administrator and not filed with the Court. Class

1 Members shall submit Objections to the Settlement Administrator by the Response Deadline. The
2 Settlement Administrator shall serve copies on all counsel as received. Following the Response
3 Deadline, Class Counsel shall file a single packet of all Objections with the Court. The Settlement
4 Administrator shall give notice to any objecting Class Member of any continuance of the hearing
5 on Plaintiffs' Motion for Final Approval of Class Action Settlement.

6 11. The Final Approval Hearing on the question of whether the Settlement should be
7 finally approved as fair, reasonable, and adequate is scheduled in Department C-63 of this Court,
8 located at 330 W. Broadway, San Diego, CA 92101 on May 1, 2026 at 1:30 p.m.

9 12. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
10 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
11 a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs'
12 application for reasonable attorneys' fees, reimbursement of litigation expenses, Service Awards,
13 settlement administration costs, and payment to the Labor & Workforce Development Agency
14 ("LWDA") for penalties under the Labor Code Private Attorneys General Act should be granted.

15 13. Counsel for the parties shall file memoranda, declarations, or other statements and
16 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
17 expenses, Plaintiffs' Service Awards, payment to the LWDA, and settlement administration costs,
18 prior to the Final Approval Hearing according to the time limits set by the Code of Civil Procedure
19 and the California Rules of Court.

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1 14. An implementation schedule is below (assuming preliminary approval is granted
2 on November 21, 2025):

Event	Date
Defendants to provide Class Member information to the Settlement Administrator no later than [20 business days after preliminary approval]:	December 22, 2025
Settlement Administrator to mail the Notice Packet to Class Members no later than [10 business days after receiving Class Member information]:	January 7, 2026
Deadline for Class Members to request exclusion from, or object to, the Settlement, or submit a dispute [60 calendar days after mailing]:	March 9, 2026
Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement [16 court days before Final Approval Hearing]:	April 9, 2026
Final Approval Hearing:	☐ May 1, 2026 at 1:30 p.m. ☐ _____ at _____ a.m. / p.m.

14 15. Pending the Final Approval Hearing, all proceedings in this action, other than
15 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this
16 Order, are stayed.

17 16. Counsel for the parties are hereby authorized to utilize all reasonable procedures
18 in connection with the administration of the Settlement which are not materially inconsistent with
19 either this Order or the terms of the Settlement.

20 **IT IS SO ORDERED.**

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22 Dated: _____, 2025

Hon. Katherine Bacal
Judge of the Superior Court