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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN DIEGO**

10 GRISELDA RAZON, individually, and on
11 behalf of all other similarly situated current
12 and former employees of DEFENDANTS,

13 Plaintiff,

14 vs.

15 TOP N CATERING, LLC, a California limited
16 liability company; and DOES 1 through 50,
inclusive,

17
18 Defendants.

CASE NO.: 37-2021-00023578-CU-OE-CTL

[Assigned for all purposes to the Honorable
Blaine K. Bowman, Dept. C-74]

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF JOINT
STIPULATION OF SETTLEMENT AND
RELEASE**

Reservation No. 100492

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20 The Motion for Preliminary Approval of a Settlement came before this Court, on [DATE],
21 2026. The Court, having considered the proposed Settlement Agreement and the exhibits attached
22 thereto (hereafter collectively "Settlement Agreement"); having considered the Motion for
23 Preliminary Approval of Class Action Settlement filed by Plaintiff; having considered the
24 respective points and authorities and declarations submitted by the parties in support thereof and
25 good cause appearing, HEREBY ORDERS THE FOLLOWING:

26 1. The Court grants preliminary approval of the settlement as set forth in the
27 Settlement Agreement and finds the terms to be within the range of reasonableness of a settlement
28 that ultimately could be granted approval by the Court at the final fairness hearing.

1.
ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL

2. For purposes of the settlement, the Court further designates Plaintiff Griselda Razon as Class Representative, and the law firm of Rastegar Law Group, APC, as Class Counsel.

3. For settlement purposes only, the Court certifies the class as: “All individuals who are or were employed by Defendant as non-exempt employees in California from May 27, 2017 to January 29, 2024.

4. The Court confirms Phoenix Settlement Administrators (“Phoenix”) as the Settlement Administrator.

5. A final fairness hearing on the question of whether the proposed settlement should be finally approved as fair, reasonable and adequate as to the members of the Settlement Class is scheduled in Department C-74 of the above-entitled Court, located at 330 W. Broadway, San Diego 92101, on _____, at _____ a.m./p.m. (the “Final Fairness Hearing”).

6. At the Final Fairness Hearing, the Court will consider: (a) whether the settlement should be approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting approval of the settlement should be entered; and (c) whether Plaintiff’s application for an award of attorneys’ fees, reimbursement of litigation expenses, and class representative enhancement should be granted.

7. Counsel for Plaintiff shall file memoranda, declarations, or other statements and materials in support of their request for final approval no later than _____.

8. Class Counsel shall file a motion for an award of attorneys’ fees, reimbursement of litigation expenses and class representative enhancement no later than _____.

9. The Court approves, as to form and content, the Notice of Class Action Settlement proposed by the parties.

10. The Court directs that by no later _____, Defendant shall provide Phoenix Settlement Administrators (“Phoenix”), the Claims Administrator with the Class Member contact Database. No later than _____, Phoenix will print and mail to each Class Member the Notice Packet approved by the Court by first-class mail, postage prepaid.

1 11. The Court finds that the forms of notice to the Settlement Class regarding the
2 pendency of the action and of this settlement and the methods of giving notice to members of the
3 Settlement Class constitute the best notice practicable under the circumstances and constitute
4 valid, due, and sufficient notice to all members of the Settlement Class. They comply fully with
5 the requirements of California Code of Civil Procedure section 382, California Civil Code section
6 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions,
7 and other applicable law. If prior to the Response Deadline any Class Notice mailed to a Class
8 Member is returned as having been undelivered by the United States Postal Service, the
9 Settlement Administrator shall use reasonable efforts, including performing a skip trace search,
10 and seek an address correction for such Class Members, and a second Class Notice will be sent to
11 any new or different address obtained. It will be presumed that, if an envelope containing the
12 Class Notice has not been returned within thirty (30) days of the mailing, the Class Member
13 received the Class Notice.

14 12. The Court further approves the procedures for Settlement Class Members to opt-
15 out of or, object to the Settlement, as set forth in the Settlement Agreement and the Class Notice.
16 Any Opt Out request that is not postmarked by the Response Deadline will be invalid

17 13. The Class Notice shall inform the Class Members of their right to object to the
18 Class Settlement if they do not Opt Out. Any Class Participants who wish to object to the Class
19 Settlement may submit a written objection to the Settlement Administrator no later than the
20 Response Deadline. Only Class Participants may object to the Settlement. The objection should
21 include the case name and number and must set forth, in clear and concise terms, a statement of
22 the reasons why the objector believes that the Court should find that the proposed Class
23 Settlement is not in the best interest of the Settlement Class and the reasons why the Class
24 Settlement should not be approved, including the legal and factual arguments supporting the
25 objection. If an objector also wishes to appear at the Final Approval and Fairness Hearing, in
26 person or through an attorney, they may do so. The Settlement Administrator will promptly serve
27 copies of any objection or notice of intention to appear on Class Counsel and Defense Counsel.
28 Class Members wishing to make an objection may appear at the Final Approval and Fairness

1 Hearing, either in person or through a lawyer retained at their own expense. The procedures and
2 requirements for filing objections in connection with the Final Fairness Hearing are intended to
3 ensure the efficient administration of justice and the orderly presentation of any Settlement Class
4 Member's objection to the Settlement Agreement, in accordance with the due process rights of all
5 Settlement Class Members.

6 14. The Class Notice shall inform the Class Members of their right to object to the
7 Class Settlement if they do not Opt Out. Any Class Participants who wish to object to the Class
8 Settlement may submit a written objection to the Settlement Administrator no later than the
9 Response Deadline. Only Class Participants may object to the Settlement. The objection should
10 include the case name and number and must set forth, in clear and concise terms, a statement of
11 the reasons why the objector believes that the Court should find that the proposed Class
12 Settlement is not in the best interest of the Settlement Class and the reasons why the Class
13 Settlement should not be approved, including the legal and factual arguments supporting the
14 objection. If an objector also wishes to appear at the Final Approval and Fairness Hearing, in
15 person or through an attorney, they may do so. The Settlement Administrator will promptly serve
16 copies of any objection or notice of intention to appear on Class Counsel and Defense Counsel.
17 Class Members wishing to make an objection may appear at the Final Approval and Fairness
18 Hearing, either in person or through a lawyer retained at their own expense.

19 15. Pending the Final Fairness Hearing, all proceedings in this action, other than
20 proceedings necessary to carry out or enforce the terms and conditions of the Settlement
21 Agreement and this Order, are stayed.

22 16. Counsel for the parties are hereby authorized to utilize all reasonable procedures in
23 connection with the administration of the settlement which are not materially inconsistent with
24 either this Order or the terms of the Settlement Agreement.

25 17. To facilitate administration of the settlement pending final approval, the Court
26 hereby enjoins all Settlement Class Members from filing or prosecuting any claims, suits or
27 administrative proceedings regarding claims released by the settlement unless and until such

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1 Settlement Class Members have filed valid requests for exclusion with the Settlement
2 Administrator and the time to opt-out of the settlement or object to the settlement has elapsed.

3 18. The Court orders the following Implementation Schedule for further proceedings:

4	Last day for Defendant to provides class	
5	member data for preparation of the Class	
6	Notice.	
7	Last day for Settlement Administrator to mail	
8	Class Notice to Settlement Class Members.	
9	Last day for Class Counsel to file motion for	
10	award of attorneys' fees, reimbursement of	
11	litigation expenses and class representative	
12	enhancement.	
13	Last day for Settlement Class Members to	
14	submit Opt-Out Requests; and last day for	
15	Settlement Class Members to submit	
16	objections.	
17	Last day for Plaintiffs and Defendant to	
18	respond to objections (if any).	
19	Last day for Settlement Administrator to	
20	provide declaration of mailing of Class Notice	
21	and data regarding Opt-Out Requests.	
22	Last day to file motion and supporting	
23	documents for final approval of class action	
24	settlement.	
25	Final Fairness Hearing.	

26 IT IS SO ORDERED.

27 Dated: September _____, 2026

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BLAINE K. BOWMAN
SUPERIOR COURT JUDGE