

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Daniel J. Kramer (SBN 314625)
daniel.kramer@wilshirelawfirm.com
Chase M. Stern (SBN 290540)
chase.stern@wilshirelawfirm.com
Alan Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

TIFFANY ROBINSON, on behalf of the State of
California and other aggrieved persons,

Plaintiff,

vs.

WILLIS TOWERS WATSON US LLC, a
Limited Liability Company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 37-2021-00036978-CU-OE-CTL

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Loren G.
Freestone, Dept. C-64]*

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

PRELIMINARY APPROVAL HEARING

Date: September 19, 2025

Time: 10:30 a.m.

Dept: C-64

Complaint filed: August 27, 2021

FAC filed: September 19, 2023

Trial date: not set

1 The Court has before it Plaintiff Tiffany Robinson's ("Plaintiff") Motion for Preliminary
2 Approval of Class Action Settlement. Having reviewed the Motion for Preliminary Approval
3 of Class Action Settlement, along with the accompanying papers, the Class Action and PAGA
4 Settlement Agreement and Class Notice (which is referred to here as the "Settlement
5 Agreement"), and good cause appearing, the Court hereby finds and orders as follows:

6 1. The Court finds on a preliminary basis that the Settlement Agreement appears to
7 be fair, adequate, and reasonable and therefore meets the requirements for preliminary approval.
8 The Court grants preliminary approval of the Settlement and the Settlement Class based upon
9 the terms set forth in the Settlement Agreement between Plaintiff and Defendant Willis Towers
10 Watson US LLC ("Defendant," and together with Plaintiff, the "Parties"), attached to the
11 Declaration of Benjamin H. Haber in Support of Plaintiff's Motion for Preliminary Approval of
12 Class Action Settlement as Exhibit 1.

13 2. The Settlement falls within the range of reasonableness of a settlement which
14 could ultimately be given final approval by this Court, and appears to be presumptively valid,
15 subject only to any objections that may be raised at the Final Approval Hearing and final
16 approval by this Court. The Court notes that Defendant has agreed to create a common fund of
17 \$425,000.00 to cover (a) settlement payments to class members who do not validly opt out; (b)
18 a \$40,000.00 payment to the State of California, Labor & Workforce Development Agency
19 ("LWDA") for its share of the settlement of claims for penalties under the Private Attorneys
20 General Act ("PAGA"), with 75% of which (\$30,000.00) being paid to the LWDA and 25%
21 (\$10,000.00) being paid to eligible Aggrieved Employees; (c) Class Representative service
22 payments of up to \$10,000.00 for Plaintiff; (d) Class Counsel's attorneys' fees, not to exceed
23 1/3 of the Gross Settlement Amount (\$141,666.67), and up to \$20,000.00 in costs for actual
24 litigation expenses incurred by Class Counsel; and (e) Settlement Administration Costs of up to
25 \$20,000.00.

26 3. The Court preliminarily finds that the terms of the Settlement appear to be within
27 the range of possible approval, pursuant to California Code of Civil Procedure § 382 and
28 applicable law. The Court finds on a preliminary basis that: (1) the settlement amount is fair

1 and reasonable to the class members when balanced against the probable outcome of further
2 litigation relating to class certification, liability and damages issues, and potential appeals; (2)
3 significant informal discovery, investigation, research, and litigation have been conducted such
4 that counsel for the Parties at this time are able to reasonably evaluate their respective positions;
5 (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented
6 by the further prosecution of the litigation; and (4) the proposed settlement has been reached as
7 the result of intensive, serious, and non-collusive negotiations between the Parties with the
8 assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds
9 that the Settlement Agreement was entered into in good faith.

10 4. A final fairness hearing on the question of whether the proposed settlement,
11 attorneys' fees and costs to Class Counsel, payment to the LWDA for its share of the settlement
12 of claims for penalties under the PAGA, and the class representative's enhancement award
13 should be finally approved as fair, reasonable and adequate as to the members of the class is
14 hereby set in accordance with the Implementation Schedule set forth below.

15 5. The Court provisionally certifies for settlement purposes only the following class
16 (the "Settlement Class"): "all call-center employees who worked for Defendant in California as
17 an hourly paid or non-exempt employee during the Class Period."

18 6. The Court finds, for settlement purposes only, that the Settlement Class meets the
19 requirements for certification under California Code of Civil Procedure § 382 in that: (1) the
20 Settlement Class Members are so numerous that joinder is impractical; (2) there are questions
21 of law and fact that are common, or of general interest, to all Settlement Class Members, which
22 predominate over individual issues; (3) Plaintiff's claims are typical of the claims of the
23 Settlement Class Members; (4) Plaintiff and Class Counsel will fairly and adequately protect
24 the interests of the Settlement Class Members; and (5) a class action is superior to other
25 available methods for the fair and efficient adjudication of the controversy.

26 7. The Court appoints as Class Representative, for settlement purposes only,
27 Plaintiff Tiffany Robinson. The Court further preliminarily approves Plaintiff's ability to
28 request an incentive award up to \$10,000.00.

1 8. The Court appoints, for settlement purposes only, Benjamin H. Haber, Daniel J.
2 Kramer, and Chase Stern of Wilshire Law Firm, PLC as Class Counsel. The Court further
3 preliminarily approves Class Counsel's ability to request attorneys' fees of up to 1/3 of the Total
4 Settlement Amount (\$141,666.67), and costs not to exceed \$20,000.00.

5 9. The Court appoints CPT Group, Inc. as the Settlement Administrator with
6 reasonable administration costs estimated not to exceed \$20,000.00.

7 10. The Court approves, as to form and content the Class Notice, attached to the
8 Settlement Agreement. The Court finds on a preliminary basis that plan for distribution of the
9 Notice to Settlement Class Members satisfies due process, provides the best notice practicable
10 under the circumstances, and shall constitute due and sufficient notice to all persons entitled
11 thereto.

12 11. The Parties are ordered to carry out the Settlement according to the terms of the
13 Settlement Agreement.

14 12. Any class member who does not timely and validly request exclusion from the
15 settlement may object to the Settlement Agreement.

16 13. The Court orders the following Implementation Schedule:

17 Defendant to provide Class List to the	Within 15 days after the Court grants
18 Settlement Administrator	Preliminary Approval of the Settlement
19 Settlement Administrator to mail the Class	Within 14 days after receipt of the Class List
20 Notice	from the Defendant
21 Response Deadline	60 days after Class Notice is mailed (or re-
22	mailed) out by the Settlement Administrator
23 Deadline to file Motion for Final Approval,	16 court days before hearing on Motion for
24 Request for Attorneys' Fees and Costs, and	Final Approval, which is _____;
25 Service Award to Plaintiffs	
26 Final Approval Hearing	_____ at _____ a.m./p.m., or
27	first available date thereafter, in Department
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	9. The hearing may be continued to another date without further notice to the Class Members.
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14. The Court further ORDERS that, pending further order of this Court, all proceedings in this lawsuit, except those contemplated herein and in the settlement, are stayed.

IT IS SO ORDERED.

DATE:

Hon. Loren G. Freestone
San Diego County Superior Court

Robinson v. Willis Towers Watson US, LLC, et al.
37-2021-00036978-CU-OE-CTL

1 PROOF OF SERVICE