

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
Plaintiffs Raeign Velasquez, Eric Rivas, and Mikayla Asevo
2. Title of the proposed order:
[Proposed] Order Granting Plaintiffs' Motion for Final Approval of Class and Representative Action Settlement
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Motion for Final Approval of Class and Representative Action Settlement
 - b. Date and time: 5/8/2025 at 2:00 p.m.
 - c. Place: 751 W. Santa Ana Blvd.
Santa Ana, CA 92701
4. The proposed order was served on the other parties in the case.

(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME:
Velasquez et al. v. Team Blaze et al.

CASE NUMBER:
30-2021-01187932-CU-OE-CXC

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action**.
 - a. My residence or business address is (*specify*):
Hyun Legal, APC, 515 S. Figueroa St., Suite 1250 Los Angeles, CA 90071
 - b. My electronic service address is (*specify*): dhyun@hyunlegal.com
 2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:
 - a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):
Sarkis A. Atoyan/Michael J. O'Connor, Atkinson, Andelson, Loya, Ruud & Romo
201 South Lake Ave., Ste. 300, Pasadena, CA 91101
[Attorneys for Defendants]
 - b. To (*electronic service address of person served*): Sarkis.Atoyan@aalrr.com; Michael.OConnor@aalrr.com
 - c. On (*date*): April 14, 2025
- ☒ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: December 19, 2024

Dennis S. Hyun

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

RAEIGN VELASQUEZ, MIKAYLA ASEVO
and ERIC RIVAS on behalf of themselves and
on behalf of all persons similarly situated

Plaintiffs,

v.

TEAM BLAZE, a California Corporation;
GHOLAMREZA MEDALI, an individual; and
DOES 1 to 100, inclusive,

Defendants.

Case No. 30-2021-01187932-CU-OE-CXC

[Assigned for all purposes to the Hon. Melissa R.
McCormick. CX104]

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Complaint Filed: March 9, 2021
Trial Date: Not set

1 Plaintiffs Raeign Velasquez, Mikayla Asevo, and Eric Rivas’ (collectively, “Plaintiffs,”
2 or “Class Representatives”) Motion for Final Approval of Class and Representative Action
3 Settlement (“Motion for Final Approval”) came on for hearing before this Court at 2:00 p.m. on
4 May 8, 2025, in Department CX-104.

5 The Court, having considered the Class and Representative Action Settlement Agreement
6 and Addendum (ROA 164) thereto (collectively, “Settlement”), Plaintiff’s unopposed Motion for
7 Preliminary Approval of Class Action Settlement and the supplemental briefing and declarations
8 filed therewith on April 12, 2024, August 15, 2024 and December 5, 2024, and the instant
9 Plaintiffs’ unopposed Motion for Final Approval of Class and Representative Action Settlement,
10 and good cause appearing thereto, grants final approval of the Settlement and HEREBY
11 ORDERS THE FOLLOWING:

12 1. On January 6, 2025, this Court entered its Order Granting Plaintiffs’ Motion for
13 Preliminary Approval of Class and Representative Action Settlement (“Order Granting
14 Preliminary Approval”). Pursuant to the Court’s Order Granting Preliminary Approval, the
15 Notice of Settlement (“Class Notice”) was sent to each Class Member and PAGA Group
16 Member by first-class mail in English and Spanish. These papers informed Class Members of the
17 terms of the Settlement, their right to receive an Individual Class Payment, their right (a) to
18 comment on or object to the Settlement, (b) to request exclusion from the Settlement and pursue
19 their own remedies, and (c) of their right to appear in person at the final approval hearing and to
20 be heard regarding approval of the Settlement. Each Class Member and PAGA Group Member
21 was also advised of his or her other right to dispute the number of workweeks and pay periods,
22 respectively, attributed to him or her. Adequate periods of time were provided for each of these
23 procedures. No member of the Class filed written objections to the proposed Settlement as part
24 of this notice process or stated an intention to appear at the final approval hearing. No disputes
25 regarding workweeks or pay periods were received from Class Members and PAGA Group
26 Members. Lastly, no Class Member has requested exclusion from the Settlement.

27 2. The Court finds that the notice procedure afforded adequate protections to Class
28 Members and provides the basis for the Court to make an informed decision regarding approval

1 of the Settlement based on the responses of the Class. The Court finds and determines that the
2 notice provided in this case was the best notice practicable, which satisfied the requirements of
3 law and due process.

4 3. With respect to the Class and for purposes of approving this Settlement only, this
5 Court finds and concludes that: (a) Class Members are ascertainable and so numerous that
6 joinder of all members is impracticable; (b) there are questions of law or fact common to the
7 Class Members, and there is a well-defined community of interest among Class Members with
8 respect to the subject matter of the Action; (c) Class Representatives' claims are typical of the
9 claims of the members of the Settlement Class; (d) Class Representatives have fairly and
10 adequately protected the interests of the members of Class Members; (e) a class action is
11 superior to other available methods for an efficient adjudication of this controversy; and (f) the
12 counsel of record for Class Representatives, i.e., Class Counsel, are qualified to serve as counsel
13 for Plaintiffs in their individual and representative capacities for the Class.

14 4. The Court has certified a Settlement Class, which is defined as the "Class"
15 pursuant to the terms of the Settlement at Paragraph I(2), which includes "non-exempt hourly
16 employees in California who were employed by Defendants during the Class Period." The Class
17 Period is the period of time beginning on September 26, 2018 through the date the Court granted
18 Preliminary Approval, or January 6, 2025.

19 5. Pursuant to Paragraph I(15) of the Settlement, "PAGA Group Members" means
20 all non-exempt, hourly-paid California employees employed by Defendants during the PAGA
21 Period. The PAGA period is the period of time from March 9, 2020 through the date the Court
22 granted Preliminary Approval, or January 6, 2025.

23 6. The Court hereby confirms Zack Broslavsky and Jonathan Weinman of
24 Broslavsky & Weinman LLP and Dennis Hyun of Hyun Legal, APC as Class Counsel.

25 7. The Court hereby confirms Plaintiffs Raign Velasquez, Mikayla Asevo, and Eric
26 Rivas as Class Representatives.

27 8. The Court finds that the terms set forth in the Settlement are fair, reasonable, and
28 adequate and in the best interests of the Class Members. The Court orders the parties and the

1 settlement administrator to effectuate the Settlement according to its terms.

2 9. The Court further finds and determines that the terms of the Settlement are fair,
3 reasonable and adequate to the Class and to each Class Member and that the Settlement is
4 ordered finally approved, and that all terms and provisions of the Settlement should be and
5 hereby are ordered to be consummated.

6 10. The Court finds and determines that the Individual Class Payments to be paid to
7 Participating Class Members as provided for by the Settlement are fair and reasonable. The
8 Court hereby grants final approval to and orders the payment of those amounts be made to
9 Participating Class Members in accordance with the Settlement.

10 11. The Court finds and determines that payment to the California Labor and
11 Workforce Development Agency (“LWDA”) of \$45,000.00 as its share of the settlement of civil
12 penalties in this case is fair, reasonable, and appropriate. The Court also finds and determines
13 that Individual PAGA Payments to be paid to Participating PAGA Group Members as provided
14 for by the Settlement are fair and reasonable. The Court hereby grants final approval to and
15 orders that the payment of those amounts be made to LWDA and PAGA Group Members in
16 accordance with the Settlement.

17 12. The Court finds and determines that the expenses in administering the Settlement
18 incurred by Phoenix Settlement Administrators (“Settlement Administrator”), in the amount of
19 \$28,500.00, are fair and reasonable. The Court hereby grants final approval to and orders
20 payment of that amount in accordance with the Settlement.

21 13. The Court finds and determines the Service Awards in the sum of \$7,500.00 to
22 each Plaintiff, *i.e.*, Raeign Velasquez, Mikayla Asevo, and Eric Rivas, for a total of \$22,500.00
23 are fair and reasonable. The Court hereby orders the Settlement Administrator to make this
24 payment to the Plaintiffs/Class Representatives in accordance with the terms of the Settlement.

25 14. Pursuant to the terms of the Settlement, and the authorities, evidence, and
26 argument submitted by Class Counsel, the Court hereby awards Class Counsel attorneys’ fees in
27 the sum of \$200,000.00 and litigation costs of \$29,375.77. The attorneys’ fees will be awarded as
28 follows: \$100,000.00 to Broslavsky & Weinman LLP and \$100,000.00 to Hyun Legal, APC. The

costs will be awarded as follows: \$13,450.21 to Broslavsky & Weinman LLP and \$15,925.56 to Hyun Legal. The Court finds such amounts to be fair and reasonable, in light of the common fund created for the benefit of the Class. The Court hereby orders the Settlement Administrator to make these payments in accordance with the terms of the Settlement.

15. Pursuant to Paragraphs III(40)-(44), Defendants shall deposit the Maximum Settlement Amount, plus all employer taxes due on wage payments to be made under this Settlement Agreement, with the Settlement Administrator in six (6) installments as follows:

a. Installment 1: One Hundred and Fifty Thousand Dollars and Zero Cents (\$150,000) within thirty (30) calendar days of the Court granting Final Approval;

b. Installment 2: One Hundred and Fifty Thousand Dollars and Zero Cents (\$150,000) within one hundred eighty (180) calendar days of the Court granting Final Approval;

c. Installment 3: Seventy-Five Thousand Dollars and Zero Cents (\$75,000) within three hundred sixty (360) calendar days of the Court granting Final Approval;

d. Installment 4: Seventy-Five Thousand Dollars and Zero Cents (\$75,000) within five hundred forty (540) calendar days of the Court granting Final Approval;

e. Installment 5: Seventy-Five Thousand Dollars and Zero Cents (\$75,000) within seven hundred twenty (720) calendar days of the Court granting Final Approval;

f. Installment 6: Seventy-Five Thousand Dollars and Zero Cents (\$75,000) within nine hundred (900) calendar days of the Court granting Final Approval;

16. The Settlement Administrator shall disburse the Maximum Settlement Amount pursuant to the terms of the Settlement Agreement. More specifically:

a. The Settlement Administrator shall pay 50% of the Individual Class Payments and Individual PAGA Payments within ten (10) business days after receipt of Installment 2. The Settlement Administrator shall pay the remaining 50% of the Individual Class Payments and Individual PAGA Payments within ten (10) business after receipt of Installment 6.

b. The Settlement Administrator shall pay Class Counsel all costs awarded

1 by the Court and 40% of attorney fees within ten (10) business days after receipt of
2 Installment 2. The Settlement Administrator shall pay the remainder of attorney fees
3 within ten (10) business after receipt of Installment 6;

4 c. The Settlement Administrator shall distribute 50% of Service Awards
5 within ten (10) business days after receipt of Installment 2 and 50% within ten (10)
6 business days after receipt of Installment 6.

7 d. The Settlement Administrator shall pay 50% of the LWDA payment
8 within ten (10) business days after receipt of Installment 3 and 50% within ten (10)
9 business days after receipt of Installment 6.

10 17. Pursuant to California Code of Civil Procedure Section 664.6 and California
11 Rules of Court, Rule 3.769(h), the Court retains jurisdiction of all matters relating to the
12 interpretation, administration, implementation, effectuation, and enforcement of this order and
13 the Settlement.

14 18. Upon completion of administration of the Settlement, the Settlement
15 Administrator will provide a final accounting report regarding the status of the settlement
16 administration to the Court and counsel for the Parties which shall be filed with the Court nine
17 (9) court days before the non-appearance compliance hearing set for August 24, 2028, at 9:00
18 a.m. in Department CX-104 [or _____ at _____ in
19 **Department CX-104**]. The final report must include all information necessary for the Court to
20 determine the total amount actually paid to class members and any amounts tendered to the State
21 Controller's Office under the unclaimed property law.

22 19. The Court hereby enters final judgment in accordance with the terms of the
23 Settlement, the January 6 2025 Order Granting Preliminary Approval of Class and
24 Representative Action Settlement, and this Order. Notice of entry of the judgment shall be
25 provided to Participating Class Members by mailing a copy of this Order and Judgment to each
26 Participating Class Member with the settlement payment(s).

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28 ///

1 20. The Parties will bear their own costs and attorneys' fees except as otherwise
2 provided by this Court's Order awarding Class Counsel's award for attorneys' fees and litigation
3 costs.

4 **IT IS SO ORDERED.**

5
6 DATED: _____

7 HON. MELISSA R. MCCORMICK
8 SUPERIOR COURT OF CALIFORNIA
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