

Electronically Received 10/21/2025 10:02 AM

07/23/2026

David W. Slayton, Executive Officer / Clerk of Court
By: T. Lewis Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ERIN JONES, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiff,

v.

COVERED 6, LLC, a California limited
liability company,

Defendant.

Case No. 21STCV26898

Honorable David S. Cunningham, III; Dept. 11

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

DATE: April 28, 2026
TIME: 9:00 a.m.
DEPT: 11

Complaint Filed: July 22, 2021
Trial Date: None

[PROPOSED] ORDER

The Motion for Preliminary Approval of Class Action and PAGA Settlement, filed by Plaintiff Erin Jones (“Plaintiff”) came on for a hearing in the above-captioned Court, the Honorable David S. Cunningham, III presiding, on April 28, 2026 at 9:00 a.m. in Department 11. Defendant Covered 6, LLC (“Defendant”) does not oppose the Motion. The Court has reviewed the materials and information submitted and **HEREBY ORDERS** as follows:

1. The Court **GRANTS** preliminary approval of the Class Action and PAGA Settlement Agreement (“Settlement”) and finds its terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by the Court at a Final Approval hearing.

2. For purposes of the Settlement only, the Court finds that the proposed Class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the Class defined as follows:

All individuals employed by Defendant as hourly non-exempt employees between July 22, 2017, and July 22, 2025.

3. The Court hereby appoints Plaintiff Erin Jones as Class Representative. The Court hereby appoints Schneider Wallace Cottrell Konecky LLP and Lawyers for Justice, PC as Class Counsel.

4. The Court designates Phoenix Class Action Settlement Administrators (“Phoenix”) as the third-party Settlement Administrator for mailing notices and administering the Settlement.

5. The Court hereby approves as to form and content the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Notice of Settlement”), attached to the Settlement Agreement as **Exhibit A**.

6. The Court finds that the Settlement Notice constitutes the best notice practicable under the circumstances, and constitutes valid, due, and sufficient notice to all Class Members. The form and method of giving notice complies fully with the requirements of Cal. Code Civ. Proc. section 382, Cal. Rules of Court, Rules 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

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

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

7 9. The Court directs the Settlement Administrator to send the Notice of Settlement to
8 the Class Members in accordance with the terms of the Settlement. The Parties are authorized to
9 make non-substantive changes to the proposed Notice of Settlement that are consistent with the
10 terms of the Settlement and this Order.

11 10. The Court hereby schedules a Final Approval Hearing on 02/17/2027 at 10: 00 a.m.
12 ~~2025, at _____ a.m./p.m.~~ in this Court, on the question of whether the Settlement, including
13 payment of attorneys' fees and costs, settlement administration costs, and Plaintiff's enhancement
14 award should be finally approved as fair, reasonable, and adequate.

15 11. 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, Plaintiff's enhancement award, and settlement administration costs prior to the Final
18 Approval Hearing according to the time limits set by the Cal. Code Civ. Proc. and the Cal. Rules of
19 Court.

20 12. The Court orders that the following implementation schedule be followed:

Event	Deadline
Deadline for Defendant to provide Phoenix with the Class List (Settlement, ¶ 4.1.)	Within fifteen (15) calendar days after the Court's Preliminary Approval of the Settlement
Deadline for Phoenix to mail the Class Notice to Class Members and Aggrieved Employees (Settlement, ¶ 7.4.2.)	Within fourteen (14) calendar days after receipt of the Class List
Deadline for Class Members to postmark written requests to opt-out or file objections to the Settlement ("Response Deadline") (Settlement, ¶ 1.43.)	Forty-five (45) days after the Class Notice is initially mailed to the Class
Deadline for Phoenix to provide all counsel with a report showing the names of the final	Within five (5) days after the Notice Deadline

Event	Deadline
number of Class Members who have submitted objections, invalid or valid requests for exclusion from the Settlement; and copies of all requests for exclusion submitted.	
Deadline for Administrator's Declaration	Not later than 14 calendar days before Plaintiff is required to file the Motion for Final Approval
Deadline for filing of Plaintiff's motion for final approval of the Settlement (Settlement, ¶ 10.)	Not later than 16 court days before the calendared Final Approval Hearing.
Effective Date (Settlement, ¶ 1.18.)	The date by when both of the following have occurred: (a) the Court enters a Judgment on its Order Granting Final Approval of the Settlement; and (b) the Judgment is final. The Judgment is final as of the latest of the following occurrences: (a) if no Participating Class Member objects to the Settlement, the day the Court enters Judgment; (b) if one or more Participating Class Members objects to the Settlement, the day after the deadline for filing a notice of appeal from the Judgment; (c) or if a timely appeal from the Judgment is filed, the day after the appellate court affirms the Judgment and issues a remittitur.
Deadline for Defendant to fund the Gross Settlement Amount into Phoenix's designated account (Settlement, ¶3.1.)	Within fifteen (15) days of the Effective Date
Deadline for Defendant to deposit the calculated employer tax contributions (Settlement, ¶ 4.2.)	Within fifteen (15) calendar days after the Effective Date.
Deadline for Phoenix to make payment for the: payments to itself for Settlement Administrator Costs from the Gross Settlement Amount; payments to Class Counsel for Class Counsel's Costs and Fee Award from the Gross Settlement Amount; Service Award to the Plaintiff as class representative from the Gross Settlement Amount; individual Settlement Awards to Participating Class Members from the Net Settlement Amount; and payments to the LWDA and to the Aggrieved Employees from the PAGA Payment (Settlement, ¶ 4.3.)	Within fourteen (14) calendar days after Defendant funds the Gross Settlement Amount
Check-cashing deadline (Settlement, ¶ 4.3.1.)	One hundred eighty (180) days after issuance

13. Pending the Final Approval Hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this

1 Order, are stayed.

2 14. Counsel for the parties are hereby authorized to utilize all reasonable procedures in
3 connection with the administration of the Settlement which are not materially inconsistent with
4 either this Order or the terms of the Settlement.

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6 **IT IS SO ORDERED.**

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8 Dated: 07/23/2026

9 
10 ~~Hon. David S. Cunningham, III~~
11 JUDGE OF THE SUPERIOR COURT
12 Honorable Bruce G. Iwasaki
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