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REYNA SANCHEZ NAVA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

REYNA SANCHEZ NAVA, individually and
on behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General,

Plaintiff,

vs.

S & S COASTAL FOODS, LLC, a Delaware
Limited Liability Company; SAMIR
ABRAHAM aka SAM ABRAHAM, an
individual; SUHAD ABRAHAM aka SUE
PRESTON, an individual; and DOES 1
through 50, inclusive,

Defendants.

Case No. 21STCV34779

*Assigned for All Purposes to: Hon. Lia
Martin, Dept. 3*

**[PROPOSED] ORDER GRANTING
MOTION FOR PRELIMINARY
APPROVAL OF CLASS, COLLECTIVE,
AND REPRESENTATIVE SETTLEMENT
AGREEMENT AND CLASS NOTICE**

Hearing Date: September 25, 2024
Hearing Time: 9:00 A.M.
Department: 3

Reservation ID: 151343951236

Complaint Filed: September 21, 2021
Trial Date: None Set

[PROPOSED] ORDER

The Motion of Plaintiff REYNA SANCHEZ NAVA (“Plaintiff”) for Preliminary Approval of Class, Collective, and Representative Settlement Agreement and Class Notice (“Motion”) came regularly for hearing before this Court on September 25, 2024. The Court, having considered the proposed Class, Collective, and Representative Settlement Agreement and Class Notice (“Settlement” or “Settlement Agreement” or “Agreement”) attached as **Exhibit 1** to the Declaration of Heather M. Davis filed concurrently with the Motion; having considered Plaintiff’s Motion for Preliminary Approval of Class, Collective, and Representative Settlement Agreement and Class Notice, the memorandum of points and authorities in support thereof, and supporting declarations filed therewith; and good cause appearing, **HEREBY ORDERS THE FOLLOWING:**

1. The Court GRANTS preliminary approval of the class action settlement as set forth in the Settlement Agreement 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 Fairness hearing. All terms used herein shall have the same meaning as defined in the Settlement Agreement. 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 following settlement Class:

All current and former non-exempt employees of Defendants S & S Coastal Foods, LLC, Samir Abraham aka Sam Abraham, and Suhad Abraham aka Sue Preston, who worked in the state of California at any time from August 12, 2017, through June 15, 2022. This includes either a Participating Class Member or Non-Participating Class Member (including a Non-Participating Class Member who qualifies as an Aggrieved Employee).

2. For purposes of the Settlement only, the Court designates Plaintiff Reyna Sanchez Nava as the Class Representative and designates Protection Law Group, LLP as Class Counsel.

3. The Court designates Phoenix Class Action Administration Solutions as the third-party Settlement Administrator.

4. The Parties are ordered to implement the Settlement according to the terms of the

1 Settlement Agreement.

2 5. The Court approves, as to form and content, the Court Approved Class Notice
3 (“Class Notice”) attached as **Exhibit A** to the Settlement Agreement.

4 6. The Court finds that the form of notice to the Class regarding the pendency of the
5 Action and of the Settlement, the dates selected for mailing and distribution, and the methods of
6 giving notice to members of the Class, satisfy the requirements of due process, constitute the best
7 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all
8 members of the Class. The form and method of giving notice complies fully with the requirements
9 of California Code of Civil Procedure § 382, California Civil Code § 1781, California Rules of
10 Court §§ 3.766 and 3.769, the California and United States Constitutions, and other applicable
11 law.

12 7. The Court further approves the procedures for Class Members to opt-out of or
13 object to the Settlement, as set forth in the Class Notice and the Settlement Agreement. The
14 procedures and requirements for filing objections in connection with the final fairness hearing are
15 intended to ensure the efficient administration of justice and the orderly presentation of any Class
16 Member’s objection to the Settlement, in accordance with the due process rights of all Class
17 Members.

18 8. The Court directs the Settlement Administrator to mail the Class Notice to the
19 members of the Class in accordance with the terms of the Settlement.

20 9. The Class Notice shall provide 60 calendar days’ notice (plus an additional 15 days
21 for Class Members whose Class Notice is re-mailed) for Class Members to submit disputes, optout
22 of, or object to the Settlement.

23 10. The hearing on Plaintiff’s Motion for Final Approval of Settlement on the question
24 of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled
25 in Department 3 of this Court, located at 111 North Hill Street, Los Angeles, California 90012 on
26 _____, at _____ a.m./p.m.

27 11. At the Final Fairness hearing, the Court will consider: (a) whether the Settlement
28 should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting

final approval of the Settlement should be entered; and (c) whether Plaintiff's application for service payments, settlement administration costs, and Class Counsel's attorneys' fees and costs, should be granted.

12. Counsel for the Parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of Plaintiff's application for service payments, settlement administration costs, Class Counsel's attorneys' fees and costs, prior to the hearing on Plaintiff's Motion for Final Approval of Settlement according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	Date
Defendant to provide class contact information and tax rate information to the Settlement Administrator no later than:	_____ [14 calendar days following preliminary approval]
Settlement Administrator to mail the Class Notice to the Class Members no later than:	_____ [14 calendar days following provision of contact information]
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	_____ [60 calendar days after mailing of the Class Notice]
Deadline for Plaintiffs to file Motion for Final Approval of Class Action and PAGA Settlement:	_____
Hearing on Motion for Final Approval of Settlement:	_____

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1 14. Pending the Final Fairness hearing, all proceedings in this Action, other than
2 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this
3 Order, are stayed. To facilitate administration of the Settlement pending final approval, the Court
4 hereby enjoins Plaintiff and all members of the Class from filing or prosecuting any claims, or
5 suits regarding claims released by the Settlement, unless and until such Class Members have filed
6 valid Requests for Exclusion with the Settlement Administrator.

7 15. Counsel for the Parties are hereby authorized to utilize all reasonable procedures in
8 connection with the administration of the Settlement which are not materially inconsistent with
9 either this Order or the terms of the Settlement.

10
11 **IT IS SO ORDERED.**

12
13
14 DATED: _____

By: _____
Hon. Lia Martin
JUDGE OF THE SUPERIOR COURT