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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

DIVA ALFARO, on behalf of herself and
others similarly situated,

Plaintiff,

vs.

PARAMOUNT RESIDENTIAL
MORTGAGE GROUP, INC., and DOES 1
to 50, inclusive,

Defendants.

Case Number: CVR12103949

*Assigned for all purposes to the
Honorable Harold Hopp, Dept. 10*

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

Date: June 7, 2023
Time: 8:30 a.m.
Dept: 10

Reservation ID: 993285268943

[Complaint filed: August 27, 2021]

1 Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement came on
2 for hearing before this Court on June 7, 2023 at 8:30 a.m., the Honorable Harold Hopp, presiding.
3 Having considered the motion and its supporting papers and for good cause shown,

4 **IT IS HEREBY ORDERED THAT:**

5 1. The Court grants preliminary approval of the proposed class action settlement based
6 upon the terms set forth in the Class Action and PAGA Settlement Agreement And Release
7 ("Settlement Agreement") attached as Exhibit 1 to the Declaration of John Glugoski in support of
8 Plaintiff's Unopposed Motion for Preliminary Approval.

9 2. The Court adopts all defined terms as set forth in the Settlement Agreement and finds
10 that the proposed settlement appears to be within the range of reasonableness necessary for
11 preliminary approval by the Court, but final determination of whether the proposed settlement terms
12 are fair, adequate and reasonable will be made at the final approval hearing.

13 3. With respect to the Class and for purposes of approving this settlement only, this
14 Court preliminarily finds that: (a) the members of the Class are ascertainable and so numerous that
15 joinder of all members is impracticable; (b) there are questions of law and fact common to the Class
16 and there is a well-defined community of interest among the Class Members with respect to the
17 subject matter of the litigation; (c) the claims of the Class Representative and the defenses thereto
18 are typical of the claims of the Class Members and the defenses thereto; (d) the Class Representative
19 will fairly and adequately protected the interests of the Class Members; (e) a class action is superior
20 to other available methods for an efficient adjudication of this controversy; and (f) counsel of record
21 for the Class Representative are qualified to serve as counsel for Plaintiff in her individual and
22 representative capacity and for the Class.

23 4. The Court therefore conditionally certifies a Settlement Class defined as follows:

24 All California-based hourly non-exempt employees and Loan
25 Officers of Defendants employed from March 1, 2020 through
26 the date of preliminary approval ("Class Period"),

27 5. The Court preliminarily approves Plaintiff Diva Alfaro to serve as the Class
28 Representative. The Court recognizes that the proposed settlement provides that Plaintiff may seek

1 a class representative service award of \$25,000, which Defendants do not oppose. The Court
2 preliminarily finds that some amount up to \$25,000 may be fair and reasonable, but the finding as
3 to the actual amount to be awarded will be determined at the final approval hearing.

4 6. The Court preliminarily approves Righetii Glugoski, P.C., and Nathan & Associates,
5 APC to serve as Class Counsel. The Court recognizes that as part of the proposed settlement,
6 Defendants have agreed not to oppose Class Counsel's fee and cost request of up to \$350,000 (35%
7 of the Total Settlement Amount). The Court preliminarily finds that some amount up to \$350,000
8 in fees and costs may be fair and reasonable, but the finding as to the actual amounts to be awarded
9 will be determined at the final approval hearing.

10 7. The Court preliminary approves the amount of \$29,250.00 from the Gross Settlement
11 Amount to be allocated to penalties under the Private Attorneys General Act of 2004. Seventy-five
12 percent (75%) of that amount, or \$21,937.50, will be paid to the LWDA and twenty-five (25%) of
13 that amount, or \$7,312.50, will be allocated on a pro-rata share basis to the aggrieved employees.

14 8. The Court approves the format and content of the Notice of Class Action Settlement
15 and Opt-Out Form, and Objection Form (the "Notice Packet") attached hereto as **Exhibits 1, 2, and**
16 **3**. The Court finds that the dissemination of the Notice Packet in the manner set forth in the
17 Settlement Agreement complies with the requirements of due process and appears to be the best
18 notice practicable under the circumstances.

19 9. The Court appoints ILYM Group, Inc. ("ILYM") to serve as the Settlement
20 Administrator and preliminarily approves that the settlement administration costs (not to exceed
21 \$15,000) be paid from the Total Settlement Amount. The Court directs ILYM to disseminate the
22 Notice Packet in the manner set forth in the Settlement Agreement.

23 10. The Court orders the following implementation schedule for further proceedings:

24 a.	Deadline for Defendants to Submit Class List and Data to Settlement Administrator	Fourteen (14) calendar days after the Preliminary Approval Order
25 b.	Deadline for Settlement Administrator to Mail the Notice Packet to Class Members	Ten (10) calendar days after Defendants provide the Settlement

		Administrator with the Class List and Data
c.	Deadline for Settlement Administrator to Mail Reminder Post-Cards to Class Members	Not more than thirty (30) calendar days (nor fewer than twenty-five (25) days) after mailing of Notice Packets to Class Members
d.	Deadline for Class Members to Submit Opt-Out Forms or Objections to Settlement	Forty-five (45) calendar days after mailing of Notice Packets to Class Members
e.	Deadline for Class Counsel to file (1) Motion for Final Approval of Class Action Settlement and (2) Motion for Award of Class Representative Enhancement Award, Claims Administrator's Expenses and Attorneys' Fees and Costs	_____, 2023
f.	Hearing on: • Motion for Final Approval of Class Action Settlement; • Motion for Award of Class Representative Enhancement Award, Settlement Administrator's Expenses and Attorneys' Fees and Costs	_____, 2023 at _____ a.m./p.m.

IT IS SO ORDERED.

Dated: _____

HONORABLE HAROLD HOPP
Judge of the Superior Court of California