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on behalf of herself and all others similarly situated
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 JESSICA WILLIAMS on behalf of herself
12 and all others similarly situated,

13 Plaintiff,

14 vs.

15 TWOMAGNETS, INC. d/b/a
16 CLIPBOARD HEALTH, a California
17 corporation; and DOES 1 through 50,
inclusive,

18 Defendants.
19
20
21

Case No. 22STCV10645

ASSIGNED FOR ALL PURPOSES TO:

Judge: Kenneth R. Freeman

Dept.: 14

Class Action

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

1 WHEREAS, this action is pending before this Court as a putative class and PAGA action
2 (the “Action”); and

3 WHEREAS, Plaintiffs, through an unopposed motion for preliminary approval, have
4 applied to this Court for an order preliminarily approving the settlement of the Action in
5 accordance with the Class Action and PAGA Settlement Agreement (“Settlement Agreement”)
6 and any exhibit annexed thereto, which sets forth the terms and conditions for a proposed
7 settlement and final resolution of the Action upon the terms and conditions set forth therein; and
8 the Court having read and considered the Settlement Agreement and the exhibit annexed thereto;

9 NOW, THEREFORE, IT IS HEREBY ORDERED:

10 1. This Order incorporates by reference the definitions in the final version of the
11 Settlement Agreement which has been filed with the Court and all terms defined therein shall
12 have the same meaning in this Order as set forth in the Settlement Agreement;

13 2. The Court hereby conditionally certifies the named Classes for settlement purposes
14 only. For the purposes of this settlement, the Classes are defined as follows:

15 a) “Main Class” means all individuals who were classified as independent
16 contractors and worked a shift in California booked through Defendant’s marketplace at any time
17 from May 17, 2022 through May 31, 2024, or through the date on which the Main Class Shifts
18 equal 703,499, whichever is earlier.

19 b) “2802 Class” means all individuals who were classified as independent
20 contractors and worked a shift in California booked through Defendant’s marketplace at any time
21 from March 28, 2018 through May 16, 2022.

22 Should for whatever reason the Settlement not become final, the fact that the Parties were
23 willing to stipulate to class certification as part of the Settlement shall have no bearing on, nor be
24 admissible in connection with, the issue of whether a class should be certified in a non-settlement
25 context;

26 3. The Court hereby authorizes the retention of CPT Group, Inc. as Administrator for
27 the purpose of this Settlement;
28

1 4. The Court hereby conditionally finds that James Hawkins, Isandra Fernandez and
2 Lance Dacre of James Hawkins APLC and Hali M. Anderson and Samara A. Bahu of
3 GrahamHollis APC, may act as counsel for the Class. The Court further conditionally finds that
4 Plaintiffs Jessica Williams and Rochell Minor may act as the Class Representatives for the Class;

5 5. The Court hereby preliminarily APPROVES the proposed Notice of Class Action
6 Settlement and Hearing Date for Final Approval (“Class Notice”). The Court further finds that the
7 Class Notice appears to fully and accurately inform the Class Members of all material elements of
8 the proposed Settlement Agreement, of the Class Members’ right to be excluded from the Class,
9 and of each Class Member’s right and opportunity to object to the Settlement. The Class Notice
10 shall be mailed to the Class Members as set forth in the Settlement Agreement;

11 6. The Court finds on a preliminary basis that the Settlement Agreement appears to
12 be within the range of reasonableness of a settlement that could ultimately be given final approval
13 by this Court. It appears to the Court on a preliminary basis that the settlement amount is fair,
14 adequate and reasonable as to all potential Class Members when balanced against the probable
15 outcome of further litigation relating to liability and damages issues. It further appears that
16 investigation and research have been conducted such that counsel for the Parties, at this time, are
17 able to reasonably evaluate their respective positions. It further appears to the Court that
18 settlement at this time will avoid substantial additional costs by all Parties, as well as avoid the
19 delay and risks that would be presented by the further prosecution of the Action. It further
20 appears that the Settlement has been reached as the result of serious and non-collusive, arms-
21 length negotiations;

22 7. The Court orders the following implementation schedule for further proceedings:

Preliminary approval order.	_____, 2025
Deadline for Defendants to provide the Class Data to the Settlement Administrator.	_____, 2025 (within fifteen (15) calendar days after Court Grants Preliminary Approval).

Mail notices to Settlement Class Members.	_____, 2025 (within fourteen (14) calendar days after Settlement Administrator Receives Class Data from Defendant).
Response Deadline for postmark by mail, fax or email of any Request for Exclusion.	, _____, 2025 (forty five (45) days after Settlement Administrator first mails Notice of Class Settlement to Settlement Class Members).
Deadline for receipt by the Settlement Administrator of any objections to the Settlement.	_____ 2025 (forty five (45) days after Settlement Administrator first mails Notice of Class Settlement to Settlement Class Members).
Response Deadline extension for re-mailed notices	_____ 2025 (14 calendar days after Response Deadline expires)
Deadline for Class Counsel to file Motion for Final Approval of Settlement.	_____ 2025
Final Approval Hearing.	_____, 2025, at 10:00 a.m.

IT IS SO ORDERED.

Dated: _____

Hon. Kenneth R. Freeman
Judge of the Los Angeles County Superior Court