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MARTIN OLSON, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

GKN AEROSPACE CHEM-TRONICS, INC.,
a California corporation, and DOES 1 through
100, inclusive,

Defendants.

AND RELATED CONSOLIDATED CASES

Case No. 37-2022-00029653-CU-OE-CTL

*[Consolidated with Case No. 37-2022-
00029655-CU-OE-CTL]*

*Assigned for All Purposes to
Hon. Euketa Oliver, Dept. C-75*

[PROPOSED] ORDER

Date: April 24, 2026

Time: 9:00am

Dept.: C-75

Complaint Filed: July 27, 2022

1 **[PROPOSED] ORDER**

2 The Motion for Preliminary Approval of Class Action and PAGA Settlement, filed by
3 Plaintiffs Martin Olson, Donald Tvrdik, Richard Turrietta and Arturo Valdivia (“Plaintiffs”) came
4 on for a hearing in the above-captioned Court, the Honorable Euketa Oliver presiding, on April 24,
5 2026 at 9:00 a.m. in Department C-75. Defendant GKN Aerospace Chem-Tronics Inc.
6 (“Defendant”) does not oppose the Motion. The Court has reviewed the materials and information
7 submitted and **HEREBY ORDERS** as follows:

8 1. The Court **GRANTS** preliminary approval of the Settlement Agreement of Class
9 Action and Private Attorneys General Act Claims (“Settlement”) and finds its terms to be within the
10 range of reasonableness of a settlement that ultimately could be granted approval by the Court at a
11 Final Approval hearing.

12 2. For purposes of the Settlement only, the Court finds that the proposed Class in the
13 Consolidated Action¹ is ascertainable and that there is a sufficiently well-defined community of
14 interest among the members of the class in questions of law and fact. Therefore, for settlement
15 purposes only, the Court grants conditional certification of the Class, defined as follows:

16 All individuals who are or were employed by Defendant as non-exempt employees in
17 California at any time from July 27, 2018 to April 24, 2026.

18 3. The Court hereby appoints Plaintiffs Richard Turrietta, Donald Tvrdik and Arturo
19 Valdivia as Class Representatives. The Court hereby appoints Schneider Wallace Cottrell Kim LLP
20 and Aegis Law Firm, PC, Lawyers *for* Justice, PC, as Class Counsel.

21 4. The Court designates Phoenix Class Action Administration Solutions as the third-
22 party Settlement Administrator for mailing notices and administering the Settlement.

23 5. The Court hereby approves as to form and content the Notice of Settlement, attached
24 to the Settlement Agreement as **Exhibit 1**.

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27 ¹ The operative complaint in the Olson/Turrieta Lawsuit is ROA No. 172, and the operative complaint in the Olson PAGA
28 Lawsuit is ROA No. 1 on its docket of the leading case, San Diego Superior Case No. 37-2022-00029653. The operative
complaint in the Tvrdik Lawsuit (San Diego Superior Case No. 37-2023-00031782) is ROA No. 9 on its docket. In
conjunction with the Settlement and pursuant to the Agreement, the Parties are also filing a Stipulation and [Proposed]
order to Consolidate Actions, in order to file an Amended Consolidated Complaint that includes all the claims so that the
Parties may seek approval of the global settlement in a streamlined manner.

1 6. The Court finds that the Settlement Notice constitutes the best notice practicable under
2 the circumstances, and constitutes valid, due, and sufficient notice to all Class Members. The form
3 and method of giving notice complies fully with the requirements of Cal. Code Civ. Proc. section
4 382, Cal. Rules of Court, Rules 3.766 and 3.769, the California and United States Constitutions, and
5 other applicable law.

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

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

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

16 10. The Court hereby schedules a Final Approval Hearing on _____,
17 2026, at _____ a.m./p.m. in this Court, on the question of whether the Settlement, including
18 payment of attorneys' fees and costs, settlement administration costs, and Plaintiffs' enhancement
19 awards should be finally approved as fair, reasonable, and adequate.

20 11. Counsel for the parties shall file memoranda, declarations, or other statements and
21 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
22 expenses, Plaintiffs' enhancement award, and settlement administration costs prior to the Final
23 Approval Hearing according to the time limits set by the Cal. Code Civ. Proc. and the Cal. Rules of
24 Court.

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

Event	Deadline
Deadline for Defendant to provide Phoenix with the Class List	Within thirty (30) business days after the Court's Preliminary Approval of the Settlement (Settlement, ¶ III.I.3.a.)
Deadline for Phoenix to mail the Class Notice to Class Members and Aggrieved Employees	Within fifteen (15) business days after receipt of the Class List (Settlement, ¶ III.I.3.b.)
Deadline for Class Members to postmark written requests to opt-out or file objections to the Settlement ("Notice Deadline")	Forty-Five (45) days after the Class Notice is initially mailed to the Class (Settlement, ¶ III.I.3.b.)
Deadline for Phoenix to provide all counsel with a report showing: (i) the names of Class Members and Aggrieved Employees; (ii) the Settlement Awards owed to each Class Member and Aggrieved Employee; (iii) the names of the Released Subclass Members, (iv) the final number of Class Members who have submitted objections or valid letters requesting exclusion from the Settlement; and (v) the number of undeliverable Notices of Settlement	Within five (5) business days after the Notice Deadline (Settlement, ¶ III.I.5.b.)
Deadline for filing of Plaintiff's motion for final approval of the Settlement	As soon as practicable
Effective Date	The date by when all of the following events have occurred: Court grants the Motion for Final Approval of the Settlement and upon service of the Notice of Entry of Order and/or Judgment, and upon the latter of: (i) if no appeal, or other challenge is filed, the sixty-first (61st) day following Notice of Entry of the Court's Order and/or Judgment; (ii) the date of affirmance of an appeal of the Order Granting Final Approval and/or Judgment becomes final under the California Rules of Court; or (iii) the date of final dismissal of any appeal from the Order Granting Final Approval and/or Judgment or the final dismissal of any proceeding on review of any court of appeal decision relating to the Order Granting Final Approval and/or Judgment. (Settlement, ¶ I.L.)
Deadline for Defendants to fund the Gross Settlement Amount into Phoenix's designated account	Within Twenty-One (21) days of the Effective Date (Settlement, ¶ III.B.2.)

Event	Deadline
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; Enhancement Awards to the Plaintiffs as class and PAGA representatives 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	Within ten (10) days after Defendant funds the Gross Settlement Amount (Settlement, ¶ III.B.1.)
Check-cashing deadline	One hundred eighty (180) days after issuance (Settlement, ¶ III.C.6.b)
Deadline for Phoenix to provide written certification of completion of administration of the Settlement to counsel for all Parties and the Court	Within ten (10) business days after the check-cashing deadline

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 Order, are stayed.

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

IT IS SO ORDERED.

DATED: April 2, 2026

HON. EUKETA OLIVER
JUDGE OF THE SUPERIOR COURT