

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
Tiara Gose-Hardy (SBN 323823)
tgose@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4774

Attorneys for Plaintiff
ANABEL GOMEZ

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
ANABEL GOMEZ

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

ANABEL GOMEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ARROYO DEVELOPMENTAL SERVICES,
a California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 25STCV00600

*[Assigned for all purposes to the Hon. David S.
Cunningham III, Dept. SSC-11]*

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

Date: July 29, 2026
Time: 11:00 a.m.
Dept.: SSC-11

1 The Motion of Plaintiff Anabel Gomez (“Plaintiff”) for Preliminary Approval of Class Action
2 Settlement will come on regularly for hearing before this Court on July 29, 2026 at 11:00 a.m. The
3 Court, having considered the proposed Amended Class Action and PAGA Settlement Agreement and
4 Class Notice (the “Settlement”), attached as Exhibit B to the Supplemental Declaration of Scott M.
5 Lidman filed concurrently with the Motion; having considered Plaintiff’s Motion for Preliminary
6 Approval of Class Action Settlement, Memorandum of Points and Authorities in support thereof, and
7 supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE
8 FOLLOWING:

9 1. The Court GRANTS preliminary approval of the class action settlement as set forth in
10 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately
11 could be granted approval by the Court at a Final Fairness Hearing. For purposes of the Settlement,
12 the Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
13 defined community of interest among the members of the Settlement Class in questions of law and fact.
14 Therefore, for settlement purposes only, the Court grants conditional certification of the following
15 Settlement Class:

16 All individuals whom Defendant classified as non-exempt employees and
17 who worked for Defendant in California at any time during the Class Period.

18 The Class Period is the period of time starting on January 9, 2021 and
19 ending on September 20, 2025.

20 2. For purposes of the Settlement, the Court designates named Plaintiff Anabel Gomez as
21 Class Representative, and Scott M. Lidman, Milan Moore, and Tiara Gose-Hardy of Lidman Law, APC
22 and Paul Haines of Haines Law Group, APC as Class Counsel.

23 3. The Court designates Phoenix Settlement Administrators as the third-party Settlement
24 Administrator for mailing notices.

25 4. The Court approves, as to form and content, the Class Notice, which means the Court
26 Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval, which is
27 attached to the Settlement as Exhibit A.

28 5. The Court finds that the form of notice to the Class regarding the pendency of the action

1 and of the Settlement, and the methods of giving notice to members of the Class, constitutes the best
2 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all members
3 of the Class. The form and method of giving notice complies fully with the requirements of California
4 Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court
5 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

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

8 7. The procedures and requirements for filing objections in connection with the Final
9 Fairness 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 8. The Court directs the Settlement Administrator to mail the Class Notice to the members
13 of the Class in accordance with the terms of the Settlement.

14 9. The Class Notice shall provide at least 60 calendar days' notice for members of the Class
15 to opt out of, or object to, the Settlement.

16 10. The Final Fairness Hearing on the question of whether the Settlement should be finally
17 approved as fair, reasonable, and adequate is scheduled in Department 11 of this Court, located at 312
18 North Spring Street, Los Angeles, California, 90012 on _____, 2026 at _____ a.m. /
19 p.m.

20 11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should
21 be finally approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting final
22 approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable
23 attorneys' fees, reimbursement of litigation expenses, service award to Plaintiff, and payment to the
24 Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private
25 Attorneys General Act ("PAGA") should be granted.

26 12. Counsel for the parties shall file memoranda, declarations, or other statements and
27 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
28 expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for

PAGA penalties prior to the Final Fairness Hearing 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 Data to Settlement Administrator	20 calendar days after issuance of the preliminary approval order
Settlement Administrator to mail Class Notice to Class Members	14 calendar days after receiving Class Data from Defendant
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 court days before Final Fairness Hearing
Final Fairness Hearing:	_____, 2026 at _____ a.m./p.m.

14. Pending the Final Fairness 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.

15. 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: _____, 2026

Honorable David S. Cunningham III
Judge of the Superior Court