D.LAW, INC.
David Keledjian, Esq. (SBN 309135)
Enoch J. Kim, Esq. (SBN 261146)
Matthew Carraher, Esq (SBN 346860)
Svetlana Hovhannisyan, Esq. (SBN 357330)
250 N. Madison Avenue, 2nd Floor
Pasadena, CA 91101-1639
Telephone: (818) 962-6465
Facsimile: (818) 962-6469
Emails: d.keledjian@d.law, l.hovhannisyan@d.law, e.kim@d.law, m.carraher@d.law

Attorneys for Plaintiffs ALDERIECH VILLAMOR and RONY ALEXIS BONILLA, on behalf of themselves and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ALDERIECH VILLAMOR and RONY ALEXIS BONILLA, on behalf of themselves and all others similarly situated, and the general public, Plaintiffs, vs. ABERCROMBIE & FITCH STORES, INC. an Ohio corporation; ABERCROMBIE & FITCH MANAGEMENT CO. a Delaware corporation; ABERCROMBIE & FITCH CO. a business entity of unknown form; and DOES 1 through 50, inclusive, Defendants.	Case No.: 25STCV03948 CLASS ACTION Assigned for All Purposes To: Hon. William F. Highberger Department: 10 **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Hearing Date: March 8, 2027 Time: 10:00 a.m. Department: 10 Original Complaint Filed: February 13, 2025 FAC Filed: April 18, 2025 SAC Filed: May 14, 2026 Trial Date: None Set

RECITALS

Plaintiffs Aldriech Villamor and Rony Alexis Bonilla ("Plaintiffs") filed an unopposed Motion for Preliminary Approval of the Class Action and PAGA Settlement ("Settlement" or "Settlement Agreement"). The Motion came on for hearing in Department 10 of this Court on March 8, 2027. The Court having considered the Settlement Agreement and the proposed Notice of Class Action Settlement ("Class Notice") attached as **Exhibit A** to the Settlement Agreement, the submissions of counsel, and all other papers filed in this litigation, hereby ORDERS as follows:

ORDER PROVISIONALLY CERTIFYING SETTLEMENT CLASS AND APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL

1. The Court finds that certification of the following class, for settlement purposes only, is appropriate:

> "all current and former non-exempt, hourly-paid employees who worked for Defendant Abercrombie & Fitch Stores, Inc. in the State of California at any time during the Class Period (July 9, 2021, through the date the Court enters an order granting Preliminary Approval of the Settlement Agreement)."

2. This Order incorporates by reference the defintions in the Settlement Agreement and all terms defined therein will have the same meaning as in this Order. The Court finds that the terms of the Settlement Agreement are within the range of possible approval at the final approval hearing.

3. The Court preliminarily finds, for settlement purposes only, that the Class meets (i) the ascertainability and numerosity requirements; (ii) the commonality requirement because, in the absence of class certification and settlement, each individual Class Member would have to litigate core common issues of law and fact, all relating to Defendants' alleged wage-and-hour violations asserted in the action; (iii) the typicality requirement because the Plaintiffs and the Class Members' claims all arise from the same alleged events and course of conduct, and are based on the same legal theories; and (iv) the adequacy of representation requirement because the Plaintiffs have the same interests as all members of the Class, and they are represented by experienced and competent counsel.

4. The Court further finds, preliminarily and for settlement purposes only, that common issues predominate over individual issues in this litigation and that class treatment is superior to the other means of resolving this dispute. Employing the class device here will not only achieve economies of scale for Class Members with individual claims, but also conserve the resources of the judicial system and preserve public confidence in the integrity of the system by avoiding the waste and delay of repetitive proceedings. In addition, certifying the class will prevent inconsistent adjudications of similar issues and claims.

5. For settlement purposes only, the Court finds that the Plaintiffs, Aldriech Villamor and Rony Alexis Bonilla, are adequate representatives and appoints them as such. The Court further finds that David Keledjian, Svetlana Hovhannisyan, Enoch J. Kim, and Matthew Carraher of D.Law, Inc., have adequately represented Plaintiffs and the Class in this litigation, and the Court appoints them as Class Counsel.

6. The Court appoints Phoenix Settlement Administrators to perform the duties of a Settlement Administrator for the purpose of issuing the Class Notice and administering the Settlement.

7. The Court recognizes that certification under this Order is for *settlement purposes only,* and shall not constitute or be construed as a finding by the Court, or an admission on the part of Defendants, that this action is appropriate for class treatment for litigation purposes. Entry of this Order is without prejudice to the rights of Defendants to oppose class certification in the action, should the proposed Settlement Agreement not be granted final approval.

PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT

8. The Court has reviewed the Settlement Agreement and the proposed Class Notice to the Settlement Agreement. The Court finds, on a preliminary basis, that the Settlement Agreement appears to be within the range of reasonableness of a settlement that could ultimately be given final approval by this Court. It appears to the Court on a preliminary basis that:

a. The settlement amount is fair and reasonable to all Class Members when balanced against the probable outcome of further litigation relating to liability and damages issues;

b. Extensive investigation and research have been conducted such that counsel for the parties at this time are reasonably able to evaluate their respective positions;

c. Settlement at this time will avoid additional substantial costs, such as those that have already been incurred by both parties, as well as avoid the delay and risks that would be presented by the further prosecution of this litigation; and

d. The proposed settlement has been reached as the result of intensive, serious, and non-collusive arm's-length negotiations after an all-day mediation with Lonnie Giamela, Esq.

9. This Court finds that the Class Notice fairly and adequately advises the Class Members of the terms of the Settlement and the process for the Class Members to obtain the benefits available under the Settlement Agreement, as well as the right of Class Members to opt out of the Class Settlement, to file documentation in opposition to the Settlement, and to appear at the final approval hearing to be conducted on the date set by the Court. The Court further finds that the Class Notice and proposed distribution of such Class Notice by first-class mail to each identified Class Member at their last known address comports with all constitutional requirements, including those of due process under the United States and California constitutions, and meets the requirements of Code of Civil Procedure § 382 and California Rules of Court rule 3.766. Accordingly, good cause appearing therefore, the Court hereby approves the proposed Class Notice.

10. The Settlement Administrator shall cause the Class Notice to be mailed by first class mail to all known members of the Class to the most recent address in Defendants' business records for each known member of the Class. The mailing of the Class Notices directed in this Order constitutes the best notice practicable under the circumstances and sufficient notice to all members of the Class.

11. The costs of settlement administration shall be paid from the Settlement Amount. Such costs shall be withheld from the Gross Settlement Amount by the Settlement Administrator pursuant to the terms of the Settlement Agreement.

12. Each member of the Class who wishes to be excluded from the Class Settlement must submit a request to be excluded from the Settlement by the deadline set forth in the Class Notice.

Any Class Member who does not submit a timely request to be excluded from the Settlement shall be bound by the terms of the Settlement Agreement.

13. The Court approves the PAGA portion of the Settlement.

OBJECTIONS TO SETTLEMENT

14. Any member of the Class who has not timely elected to be excluded from the Class Settlement, and who wishes to object to the fairness, reasonableness, or adequacy of the Settlement Agreement, or to the award of attorneys' fees and costs, shall provide to the Settlement Administrator a written statement of the objection, as well as the specific reasons, if any, for each objection. The Settlement Administrator will promptly transmit any objections it receives to Class Counsel and Defendants' counsel.

15. All written objections must be signed by the Class Member and must include the information specified in the Class Notice.

16. A Class Member may appear either in person or through personal counsel at the Final Hearing to object to the Settlement. If represented by personal counsel, the counsel will be hired at the Class Member's expense.

17. Class Counsel and Defendants' counsel shall promptly furnish each other with copies of any and all objections or written requests for exclusion that come into their possession.

FINAL APPROVAL HEARING

18. The Court sets a final approval hearing on _____, 2027, at a.m./p.m. in Department 10 of this Court ("Final Approval Hearing"), as set forth in the Class Notice, to determine whether the proposed settlement of this action is fair, reasonable, and adequate and should be finally approved. The Court will also consider at the Final Approval Hearing whether applications for Plaintiffs' attorneys' fees and costs and enhancement awards to the Plaintiffs should be granted and, if so, in what amounts.

19. Members of the Class who have not timely elected to be excluded from the Class and who object to the proposed Settlement may appear and present such objections at the Final Approval Hearing in person or by counsel.

20. Plaintiffs shall file their motion for final approval of the Settlement and their request for approval of the attorneys' fees, litigation costs, and enhancement award no later than sixteen (16) court days prior to the Final Approval Hearing. After the Final Approval Hearing, the Court may enter a Final Order and Final Judgment in accordance with the Settlement Agreement that will adjudicate the rights of all Class Members.

21. All discovery and other pretrial proceedings in this action are stayed and suspended until further order of this Court, except such actions as may be necessary to implement the Settlement Agreement and this Order.

22. If, for any reason, the Court does not grant final approval of the Settlement, all evidence and proceedings held in connection therewith shall be without prejudice to the status quo ante rights of the parties to the litigation as more specifically set forth in the Settlement Agreement.

IT IS SO ORDERED.

Dated: _____, 2026

_____
Hon. William F. Highberger
Judge of the Superior Court