

1 **THE WHEELER LAW FIRM, APC**

2 Scott Ernest Wheeler (SBN 187998)

3 Justin A. Wheeler (SBN 342226)

4 250 West First Street, Suite 216

5 Claremont, California 91711

6 Telephone: (909) 621-4988

7 Facsimile: (909) 621-4622

8 Email: sew@scottwheelerlawoffice.com

9 jaw@scottwheelerlawoffice.com

10 *Attorney for Plaintiff and the Putative Class*

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

DEC 30 2025

By Sherrri Scott
SHERRI SCOTT, Deputy

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF SAN BERNARDINO**

13 **RANCHO CUCAMONGA DISTRICT**

14 RENE C. SALVADOR, individually, and
15 on behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 CIUTI INTERNATIONAL, INC., a
19 California corporation; and DOES 1
20 through 50, inclusive,

21 Defendants.

CASE NO.: CIVRS240025

~~[PROPOSED AMENDED]~~ ORDER
GRANTING PRELIMINARY APPROVAL
OF CALSS AND PAGA SETTLEMENT

1 **[PROPOSED AMENDED] ORDER GRANTING PRELIMINARY APPROVAL**

2 The Court now has before it, Plaintiff's unopposed Motion for Preliminary Approval of Class
3 Action Settlement ("Motion"). After reviewing the Motion, the Class Action and PAGA Settlement
4 Agreement and Release ("Settlement Agreement") and exhibits attached thereto, and good cause
5 appearing therefore, the Court hereby finds and orders as follows:

6 1. The Court finds on a preliminary basis that the settlement memorialized in the
7 Settlement Agreement appears to be fair and adequate, and falls within the range of reasonableness,
8 and therefore meets the requirement for preliminary approval.

9 2. The Court conditionally certifies for settlement purposes the following class (the
10 "Class" or "Settlement Class"):

11 All non-exempt, hourly employees not bound by an agreement to arbitrate
12 disputes who were employed and worked for Defendant, in the State of
13 California, at any time from August 12, 2020, through October 10, 2025.

14 The Class Period is from March 7, 2019, through August 31, 2025.

15 3. The Court conditionally approves for settlement purposes the following PAGA
16 Settlement Members ("PAGA Member" or "PAGA Members"):

17 All non-exempt, hourly employee who was employed and worked for
18 Defendant at any time during the time period of August 12, 2023, through
19 October 10, 2025.

20 The PAGA Period is August 12, 2023, through October 10, 2025.

21 4. The Court conditionally approves for settlement purposes the PAGA allocation of this
22 settlement to the California Labor and Workforce Development Agency ("LWDA") and PAGA
23 Members.

24 5. The Court finds, for settlement purposes, that the Class meets the requirements for
25 certification under California Code of Civil Procedure § 382 in that: (1) the Class is so numerous that
26 joinder is impractical; (2) there are questions of law and fact that are common, or of general interest,
27 to the Class, which predominate over any individual issues; (3) Plaintiff's claims are typical of the
28 claims of the Class; (4) Plaintiff and Plaintiff's counsel will fairly and adequately protect the interests
 of the Class; and (5) a class action is superior to other available methods for the fair and efficient

1 adjudication of the controversy.

2 6. The Court appoints, for settlement purposes, Plaintiff Rene C. Salvador as
3 Representative for the Class.

4 7. The Court appoints, for settlement purposes, The Wheeler Law Firm, APC as Counsel
5 for the Class.

6 8. The Parties are ordered to carry out the Settlement according to the terms of the
7 Settlement Agreement.

8 9. The Court appoints ILYM Group, Inc. ("ILYM Group") as the Settlement
9 Administrator and is ordered to carry out the administration of the settlement according to the terms
10 of the Settlement Agreement.

11 10. The Court approves as to form and content of the Class Action and PAGA Settlement
12 Notice. The Court finds that the dates selected for the mailing and distribution of the Notice Packet
13 meet the requirements of due process, provide the best notice practicable under the circumstances,
14 and shall constitute due and sufficient notice to all persons entitled thereto.

15 11. If any Class Member objects to the Settlement Agreement, the objecting party is not
16 required, either personally or through counsel: 1) to appear at the hearing on the motion for final
17 approval for that party's objection to be considered; or 2) to file or serve, or to state in the objection,
18 a notice of intention to appear at the hearing on the motion for Final Approval of the Class Settlement.

19 12. ILYM Group, the Settlement Administrator, shall provide notice to any objecting party
20 of any continuance of the hearing of Plaintiff's Motion for Final Approval.

21 13. The Parties are ordered to carry out the Settlement according to the following
22 implementation schedule:

Event	Date
Last day for Defendants to provide the Settlement Administrator with the Class Information	January 20, 2026
Last day for Settlement Administrator, ILYM Group to mail Class Notice	January 30, 2026
Last day for Class Members to submit a dispute regarding Workweeks, Request for Exclusion, or written Objection	March 16, 2026

1	Last Day for Plaintiff to file Motion for Final Approval of the	
2	Class Settlement, Attorneys' Fees and Costs and Class	Per Code.
3	Representative Service Award	
4	Final Approval Hearing	April 15, 2026 at 9:00 am

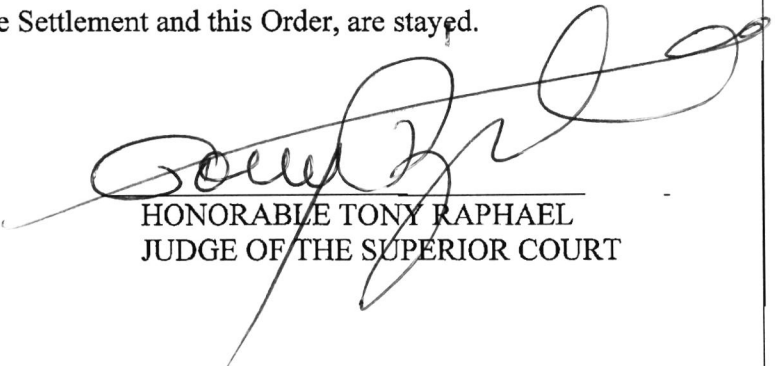
14. The Court finds that the method of giving notice to the Class constitutes the best means practicable of providing notice under the circumstances. The Court further finds that the Notice Packet and the method of giving notice to the Class meet the requirements of California Code of Civil Procedure § 382, California Rules of Court, Rules 3.766 and 3.769, and due process under the California and United States Constitutions, and other applicable law.

15. At the Final Approval Hearing, the Court will consider whether the Settlement should be finally approved as fair, reasonable and adequate, whether a final judgment should be entered, and whether the payments provided for under the Settlement, including attorneys' fees and costs and class representative service award, should be finally approved and granted.

16. Pending the Final Approval Hearing, all proceedings in this Action, other than proceedings necessary to implement the Settlement and this Order, are stayed.

IT IS SO ORDERED.

DATED: 12-30-2025


HONORABLE TONY RAPHAEL
JUDGE OF THE SUPERIOR COURT

I, the undersigned, am at least 18 years old and not a party to this action. I am employed in the County of Los Angeles. My business address is 250 West First Street, Suite 216, Claremont, California 91711. My Email Address is carolina.castellanos@scottwheelerlawoffice.com.

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

Attorneys for Defendants,
CIUTI INTERNATIONAL, INC.

Labor Workforce Development Agency
Department of Industrial Relations
Private Attorneys General Act (PAGA) Filing
Proposed Settlement of PAGA Case
<https://dir.tfaforms.net/271>

- ☐ [by **MAIL**] - I enclosed the document(s) in a sealed envelope or package addressed to the person(s) whose address(es) are listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Claremont, California, in a sealed envelope with postage fully prepaid.
- ☒ [by **ELECTRONIC SERVICE**] - Based on a court order or an agreement of the parties to accept service by electronic transmission, I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.
- ☐ [by **PERSONAL SERVICE**] - I caused to be delivered by messenger such envelope(s) by hand to the office of the addressee(s). Such messenger is over the age of eighteen years and not a party to the within action and employed with A&G Attorney Services whose business address is 13089 Peyton Drive, Suite C-154, Chino Hills, California 91709.
- ☒ [by **STATE**] - I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed December 23, 2025, at Claremont, California.

Carolina Castellanos
Print Name

By:

Signature _____