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15 on behalf of herself and others similarly situated

16 *[Additional Counsel Next Page]*

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18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF LOS ANGELES**

20 ANGELA HOWARD; MONIQUE
21 GALLEGOS; PATRICIA RICO; and
22 YVONNE SAZMA, on behalf of themselves
23 and others similarly situated,

24 Plaintiffs,

25 vs.

26 ANTELOPE VALLEY HOSPITAL, INC.;
27 ANTELOPE VALLEY HOSPITAL
28 FOUNDATION; and DOES 1 to 100, inclusive,

Defendants.

Case No.: 22STCV22286

CLASS AND PAGA ACTION

*[Assigned for all purposes to the
Hon. Theresa M. Traber, Dept. 1]*

**~~[REVISED PROPOSED]~~ ORDER
GRANTING PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

*[Filed concurrently with Plaintiffs' Notice of
Motion and Motion for Preliminary Approval
of Class Action and PAGA Settlement; and
Declarations in Support]*

Hearing Information:

Date: June 4, 2026

Time: 10:30 a.m.

Dept.: 1

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1 The Motion for Preliminary Approval of Class Action and PAGA Settlement came before this
2 Court on June 4, 2026, at 10:30 AM, in Department 1 of Los Angeles County Superior Court located
3 at 312 N. Spring St., Los Angeles, California 90012. The Court, having considered the proposed
4 Amended Class Action And PAGA Settlement Agreement And Class Notice attached as **Exhibit 1**
5 to the Further Declaration of Monique Toby in Support of Plaintiffs' Motion for Preliminary Approval
6 of Class Action Settlement, and the Exhibits attached thereto (hereafter collectively, the "Settlement"
7 or "Settlement Agreement"); having considered the Declaration of Monique N. Toby in Support of
8 Plaintiffs' Motion for Preliminary Approval of Class Action Settlement submitted on May 7, 2026;
9 having considered the Motion for Preliminary Approval of Class Action and PAGA Settlement filed
10 by Plaintiffs; having considered the respective points and authorities and declarations submitted by
11 the parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

19 All current and former nonexempt employees employed by Defendant in
20 California during the Class Period. The "Class Period" means the time
21 between April 1, 2020, through December 31, 2022.

22 1. For purposes of the Settlement, the Court further designates named Plaintiffs Angela
23 Howard, Monique Gallegos, Patricia Rico, and Yvonne Sazma as Class Representatives.

24 2. The Court appoints Joseph Lavi, Esq. and Vincent C. Granberry, Esq. of Lavi &
25 Ebrahimi, LLP; Arrash T. Fattahi and Arman A. Salehi of Wilshire Law Firm, PLC; and Paul K.
26 Haines and Sean M. Blakely of Haines Law Group, APC as Class Counsel.

27 3. The Court appoints ILYM Group, Inc., as the Settlement Administrator.

28 4. The Court finds that there is sufficient evidence for the Court to find that the gross

1 settlement fund, deductions thereto, and resulting net settlement fund (from which individual
2 payments will be calculated pursuant to the terms of the Settlement) are fair, adequate and reasonable,
3 and the Court therefore preliminarily approves the following amounts, to be approved at the final
4 fairness hearing:

- 5 a. Gross Settlement Amount ("GSA"): \$1,750,000.00
- 6 b. LWDA Allocation: *Total \$100,000.00, composed of:*
 - 7 i. LWDA Payment: \$75,000.00 (75% of LWDA Allocation)
 - 8 ii. Aggrieved Employees: \$25,000.00 (25% of LWDA Allocation)
- 9 c. Expected Deductions:
 - 10 i. \$36,000.00 - Class Representative Enhancement Awards (\$9,000 to each
11 Plaintiff)
 - 12 ii. \$583,333.33 - Attorneys' Fees (up to one-third (1/3) of GSA)
 - 13 iii. \$50,000.00 - Attorneys' Costs (according to proof)
 - 14 iv. \$17,750.00 - Settlement Administration Costs (according to proof)

15 5. A final fairness hearing on the question of whether the proposed Settlement should be
16 finally approved as fair, reasonable and adequate as to the members of the Settlement Class is
17 scheduled in Department 1 of this Court, located at 312 N. Spring St., Los Angeles, California 90012,
18 on November 18, 2026, at 10:30 a.m. ("Final Hearing").

19 6. At the Final Hearing, the Court will consider: (a) whether the Settlement should be
20 approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting approval of
21 the Settlement should be entered; and (c) whether Plaintiffs' application for an award of attorneys'
22 fees, reimbursement of litigation expenses, and class representative enhancement should be granted.

23 7. Class Counsel shall file memoranda, declarations, or other statements and materials in
24 support of their request for final approval by no later than 16 court days prior to the Final Hearing.

25 8. Class Counsel shall file a motion for an award of attorneys' fees, reimbursement of
26 litigation expenses and class representative enhancement by no later than 16 court days prior to the
27 Final Hearing.

1 9. The Court approves, as to form and content, the Class Notice which is attached to
2 the Settlement Agreement as **Exhibit A.**

3 10. Within fifteen (15) calendar days after the entry of this Order, Defendant shall provide
4 the Settlement Administrator the names, last known mailing addresses, and Social Security numbers
5 of each Class Member, along with the number of Class Period Workweeks and PAGA Pay Periods
6 they worked, and any other information needed to calculate Individual Settlement Payments and
7 Individual PAGA Payments (“Class Data”).

8 11. Within fourteen (14) calendar days of receipt of the Class Data from Defendant, the
9 Settlement Administrator shall mail the Class Notice to all Settlement Class Members via first-class
10 U.S. mail.

11 12. Settlement Class Members shall have forty-five (45) calendar days from the date of
12 the postmark on the Class Notice, to return to the Settlement Administrator, Requests for Exclusion,
13 disputes, or Objections (“Response Deadline”), however, Settlement Class Members whose Class
14 Notice is remailed will have an additional fourteen (14) calendar days beyond the Response
15 Deadline.

16 13. The Court finds that the form of Class Notice to the Settlement Class regarding the
17 pendency of the action and of this Settlement, and the methods of giving notice to members of the
18 Settlement Class constitute the best notice practicable under the circumstances and constitute valid,
19 due, and sufficient notice to all members of the Settlement Class. They comply fully with the
20 requirements of California Code of Civil Procedure section 382, California Civil Code section
21 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions,
22 and other applicable law.

23 14. The Court further approves the procedures for Settlement Class Members to
24 participate in, opt out of, or object to the Settlement, as set forth in the Settlement Agreement and
25 Class Notice.

26 15. Any Participating Class Member who wishes to object in writing may send written
27 objections to the Settlement Administrator, by fax, email or mail, not later than 45 days after the
28 Administrator mails the Class Notice (plus an additional 14 days for Class Members whose Class

1 Notice is re-mailed). Participating Class Members may appear in Court (or hire an attorney to appear
2 in Court) to present oral objections at the Final Approval Hearing.

3 16. Class Members who wish to exclude themselves (opt out of) the Class Settlement
4 must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not
5 later than 45 days after the Administrator mails the Class Notice (plus an additional 14 days for
6 Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class
7 Member or the Class Member's representative that reasonably communicates the Class Member's
8 election to be excluded from the Settlement and includes the Class Member's name, address, and
9 email address or telephone number.

10 17. Pending the Final Hearing, all proceedings in this action, other than proceedings
11 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
12 Order, are stayed.

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

16 19. The Court orders the following Implementation Schedule for further proceedings:

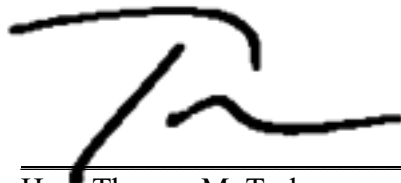
Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Data	15 calendar days after the Court's entry of this Order
Notice Date: Last day for Settlement Administrator to mail Class Notice to Settlement Class Members.	14 calendar days after receipt of the Class Data from Defendant
Response Deadline: (i) Last day for Settlement Class Members to submit Requests for Exclusion; and (ii) last day for class members to submit Objections.	45 calendar days after the Settlement Administrator has postmarked the Class Notice for mailing to Settlement Class Members, or additional 14 calendar days after the Response Deadline for Settlement Class Members whose Class Notice is remailed.
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancement.	16 court days prior to the Final Hearing
Last day for class counsel to file motion and supporting documents for final approval of class action settlement.	16 court days prior to the Final Hearing

1	Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
2	Hearing on final approval of class action settlement.	November 18, 2026, at 10:30 a.m.
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4 20. The Final Hearing and related prior deadlines set forth above may, from time to time
5 and without further notice to the Settlement Class (except those who have filed timely and valid
6 objections), be continued or adjourned by Order of the Court.

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8 **IT IS SO ORDERED.**

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10 Dated: 06/30/2026



Hon. Theresa M. Traber
Judge of the Superior Court