SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

SIMON RIVERA, on behalf of himself and others similarly situated,

Plaintiff,

vs.

STEPAN COMPANY; and DOES 1 to 100, inclusive,

Defendants.

Case No.: 30-2025-01470277-CU-OE-CXC

CLASS AND PAGA ACTION

[*Assigned for All purposes to the Hon. Layne H. Melzer, Dept. CX102*]

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

[*Filed concurrently with Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Declaration of Paolo Policastro in Support Thereof*]

Hearing Information:
Date: February 4, 2027
Time: 02:00 p.m.
Dept.: CX102

The Motion for Preliminary Approval of a Settlement came before this Court on February 4, 2027, at 2:00 p.m., in Department CX102 of the Orange County Superior Court located at 751 W. Santa Ana Blvd., Santa Ana, CA 92701. The Court, having considered the proposed Class Action and PAGA Settlement Agreement and Class Notice entered into by and between Plaintiff Simon Rivera ("Plaintiff") and Defendant Stepan Company ("Defendant") attached as **Exhibit 1** to the Declaration of Paolo Policastro in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement (ROA Number __), and the Exhibits attached thereto (hereafter collectively, the "Settlement" or "Settlement Agreement"); having considered the Motion for Preliminary Approval of Class Action and PAGA Settlement filed by the parties; having considered the memorandum of points and authorities and declarations submitted by the parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

All current and former nonexempt employees employed by Defendant in California during the Class Period. The "Class Period" is the period from March 24, 2021, through May 4, 2026.

2. For purposes of the Settlement only, the Court further designates named Plaintiff Simon Rivera as Class Representative, and Joseph Lavi, Esq. and Vincent C. Granberry, Esq., Jeffrey D. Klein, Esq., and Paolo Policastro, Esq., of Lavi & Ebrahimian, LLP as Class Counsel.

3. The Court appoints Phoenix Class Action Administration Solutions, as the Settlement Administrator.

4. A final fairness hearing on the question of whether the proposed Settlement should be finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in

Department CX102 of this Court, located at 751 W. Santa Ana Blvd., Santa Ana, CA 92701 on _____, 2027, at _____ a.m./p.m.

5. At the final fairness hearing, the Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Class and Aggrieved Employees; (b) whether a judgment granting approval of the Settlement should be entered, which shall constitute a complete release and bar with respect to the Released Class Claims and Released PAGA Claims; and (c) whether Plaintiff's application for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment should be granted.

6. Counsel for the Parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval by no later than 16 court days prior to the final fairness hearing. Plaintiff will provide the motion for final approval to Defendant for its review and approval at least seven (7) days before filing. The Parties will jointly draft the Order of Final Approval.

7. Class Counsel shall file a motion for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment no later than 16 court days prior to the final fairness hearing.

8. The Court approves, as to form and content, the Class Notice and related documents which are appended as **Exhibit 2** to the concurrently filed Declaration of Paolo Policastro.

9. The Court finds that there is sufficient evidence for the Court to find that the gross settlement fund, deductions thereto, and resulting net settlement fund (from which individual payments will be calculated pursuant to the terms of the Settlement) are fair, adequate and reasonable, and the Court therefore preliminarily approves the following amounts, to be approved at the final fairness hearing:

a. Gross Settlement Amount ("GSA"): $250,000.00

b. PAGA Penalties: Total $15,000.00, composed of:

i. LWDA Payment: $9,750.00 (65% of PAGA Penalties)

ii. Aggrieved Employees: $5,250.00 (35% of PAGA Penalties)

c. Expected Deductions: Total $116,833.33, composed of:

d. $7,500.00 - Class Representative Service Payment

e. $83,333.33- Class Counsel Fees (1/3 of GSA)

f. $20,000.00 – Class Counsel Expenses

g. $6,000.00 – Administration Expenses Payment

10. No later than twenty-one (21) days following the date the Court enters this order, Defendants shall provide the following information to the extent in the Defendant's possession to the Settlement Administrator for each Settlement Class Member: name, last-known mailing address, Social Security number, number of Eligible Workweeks and Eligible Pay Periods or data sufficient for the Settlement Administrator to determine Eligible Workweeks and Eligible Pay Periods. ("Class Data").

11. Within fourteen (14) calendar days after receiving the Class Data, the Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in the Class Data by first-class U.S. Mail.

12. Class Members shall have sixty (60) calendar days from the date the Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement ("Response Deadline"), except that a Class Member who is an Aggrieved Employee under PAGA cannot opt out of the PAGA Penalties portion of the Settlement, and only Class Members who do not opt-out of the Settlement can object to the Settlement. Class Members to whom Notice Packets are resent after having been returned undeliverable to the Administrator shall have an additional fourteen (14) calendar days after the Response Deadline has expired. Per the terms of the Settlement, all Aggrieved Employees will be bound as to the Released PAGA Claims if the Settlement is finally approved and cannot opt-out of the Settlement as to the Released PAGA Claims. Aggrieved Employees include all current and former non-exempt employees employed by Defendant in California during the time period of March 29, 2024 through May 4, 2026 (the "PAGA Period").

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

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

15. Class Members who wish to exclude themselves from (opt-out of) the Class Settlement must send the Administrator, by fax, email, or mail, a signed and dated written Request for Exclusion not later than sixty (60) days after the Administrator mails the Class Notice (plus an additional fourteen (14) days for Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class Member or the Class Member's representative that reasonably communicates the Class Member's election to be excluded from the Settlement and includes the Class Member's name, address, and email address or telephone number. To be valid, a Request for Exclusion must be timely faxed, emailed, or postmarked by the Response Deadline.

16. Participating Class Members may send written objections to the Administrator by fax, email, or mail. Only Settlement Class Members who have not opted out of the class (i.e., Participating Class Members) may object to the Settlement. In the alternative, Participating Class Members may appear in Court (or hire an attorney to appear in Court on their behalf) to present verbal objections at the Final Approval Hearing. A Participating Class Member who elects to send a written objection to the Administrator must do so not later than sixty (60) days after the Administrator's mailing of the Class Notice (plus an additional 14 days for Class Members whose Class Notice was re-mailed).

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

18. 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.

19. The Court has continuing jurisdiction pursuant to California Code of Civil Procedure section 664.6 and California Rules of Court rule 3.769(h).

20. 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 Database	21 days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	60 calendar days after the date of mailing of the Class Notice (plus an additional 14 days for Class Members whose Class Notice is re-mailed)
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 fairness hearing
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 Court days prior to the final fairness hearing
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	Approximately 150 days after the Court grants preliminary approval of the Settlement

21. The Fairness Hearing and related prior deadlines set forth above may, from time to time and without further notice to the Class (except to those who have filed timely and valid objections), be continued or adjourned by Order of the Court. The Settlement Administrator will provide notice to any objecting Class Member if there is a change in the date and/or time of the Final Approval Hearing.

IT IS SO ORDERED.

Dated: _____

_____
Hon. Layne H. Melzer
Judge of the Superior Court