

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Alexandra R. McIntosh (SBN 320904)
amcintosh@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JOSHUA KOVACOVSKY, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

WAREHOUSE SERVICES LOGISTICS, LLC, a
South Carolina limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2507157

*[Assigned for all purposes to the Hon.
Charlie L. Hill, Jr., Dept. S30-SBJC]*

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

Date: February 25, 2027
Time: 8:30 a.m.
Dept.: S30-SBJC

Action Filed: March 12, 2025
Trial Date: None Set

1 The Motion of Plaintiff Joshua Kovacovsky (“Plaintiff”) for Preliminary Approval of
2 Class Action Settlement came on regularly for hearing before this Court on February 25, 2027 at
3 8:30 a.m. This Court, having considered the proposed Stipulation of Settlement (the “Settlement”)
4 attached to the Declaration of Sean M. Blakely filed concurrently herein; having considered
5 Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement,
6 Memorandum of Points and Authorities in support thereof, and supporting declarations filed
7 therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All current and former non-exempt employees employed by Defendant
16 Warehouse Services Logistics, LLC in California from June 12, 2021
17 through August 17, 2026 (the “Class Period”).

18 2. For purposes of the Settlement, the Court designates Plaintiff as Class
19 Representative and designates Paul K. Haines, Sean M. Blakely, and Alexandra R. McIntosh of
20 Haines Law Group, APC as Class Counsel.

21 3. The Court designates ILYM Group, Inc. as the third-party Settlement
22 Administrator for mailing notices.

23 4. The Court approves, as to form and content, the Class Notice and Notice of
24 Estimated Individual Settlement Award (collectively, the “Notice Packet”), attached as Exhibits
25 A and B, respectively, to the Settlement.

26 5. The Court finds that the form of notice to the Settlement Class regarding the
27 pendency of the action and of the Settlement, and the methods of giving notice to members of the
28 Settlement Class, constitute the best notice practicable under the circumstances, and constitute

valid, due, and sufficient notice to all of the Settlement Class members. The form and method of giving notice complies 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.

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

7. The procedures and requirements for filing objections in connection with the Final Fairness Hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Settlement Class member's objection to the Settlement in accordance with the due process rights of all members of the Settlement Class.

8. The Court directs the Settlement Administrator to mail the Notice Packet to the members of the Settlement Class in accordance with the terms of the Settlement.

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

10. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department S30-SBJC of this Court, located at 247 West Third Street, San Bernardino, California 92415 on _____, 2027 at _____.

11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, class representative service award to Plaintiff, amount set aside as PAGA penalties, and settlement administration costs should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's class representative service award, and settlement administration costs, 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 the Settlement Administrator no later than [10 business days after preliminary approval]:	March 11, 2027
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	March 25, 2027
Deadline for Settlement Class members to request exclusion from, submit a workweek dispute, or object to, the Settlement [60 calendar days after mailing]:	May 24, 2027
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	June 21, 2027
Final Fairness Hearing:	_____

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: _____, 2027

Hon. Charlie L. Hill, Jr.
Judge of the Superior Court