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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

MOHINDERPAL DHALIWAL, an individual,

Plaintiff,

v.

APPLIED MATERIALS, INC., a Delaware corporation; and DOES 1 through 20, inclusive,

Defendant.

Case No. 25CV466613

[PROPOSED] ORDER:

(1) PRELIMINARILY APPROVING PROPOSED SETTLEMENT;

(2) CONDITIONALLY CERTIFYING SETTLEMENT CLASS;

(3) APPOINTING CLASS REPRESENTATIVE, CLASS COUNSEL, AND SETTLEMENT ADMINISTRATOR;

(4) APPROVING CLASS NOTICE AND RELATED MATERIALS; AND

(5) SETTING HEARING FOR FINAL APPROVAL OF SETTLEMENT

Judge: Charles F. Adams
Dept.: 7

Complaint filed: May 23, 2025
FAC filed: March 3, 2026
Trial date: None set

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APPLIED MATERIALS, INC.

The joint motion of plaintiff Mohinderpal Dhaliwal ("Plaintiff") and defendant Applied Materials, Inc. ("Defendant" or "Applied") (together, the "Parties") for Preliminary Approval of Class Action Settlement (the "Motion") came on regularly for hearing before this Court on November 12, 2026 at 1:30 p.m. The Court, having considered the proposed Settlement Agreement (the "Settlement"), attached as Exhibit 1 to the Declaration of Aaron A. Bartz filed concurrently with the Motion; having considered the Motion, Memorandum of Points and Authorities in support thereof, and supporting declarations filed therewith, and any argument presented at the hearing on the Motion; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

> All current and former employees who worked for Applied in a non-exempt position in California at any time from March 1, 2024 through December 8, 2025.

2. For purposes of the Settlement, the Court designates plaintiff Mohinderpal Dhaliwal as Class Representative, and designates Aaron A. Bartz of Bartz Law Group, APC and Walter L. Haines of United Employees Law Group, PC as Class Counsel.

3. The Court designates Apex Class Action Administration as the third-party Settlement Administrator for mailing notices.

4. The Court approves, as to form and content, the Notice of Proposed Class Action Settlement and Final Approval Hearing ("Class Notice"), and the Notice of Estimated Settlement Share, attached as Exhibit A and Exhibit B, respectively, to the Settlement (collectively, the "Class Notice Packet").

5. The Court finds that the form of notice to the Class Members regarding the pendency of the action and of the Settlement, and the methods of giving notice to Class Members, constitute the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all Settlement Class members. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure section 382, 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 Class Members to opt out of or object to the Settlement, as set forth in the Class Notice.

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

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

9. The Notice shall provide at least 45 calendar days' notice from the date of initial mailing for Class Members to object to the Settlement, opt out of the Settlement, or submit disputes regarding the information shown on their Notices of Estimated Settlement Share.

10. The Final Approval Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 7 of this Court, located at 191 N. First Street, San Jose, California 95113, on _____, 2027 at ____:____ a.m. / p.m.

11. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the 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, representative payment to Plaintiff, 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 representative payment, and settlement administration costs prior to the Final Approval 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**
Applied to provide Class Member Information to Settlement Administrator no later than [30 days after preliminary approval]:	_____
Settlement Administrator to mail Class Notice Packets to Class Members no later than [15 days after receiving Class Member Information]:	_____
Deadline for Class Members to object to the Settlement, opt out of the Settlement, or submit disputes to the Settlement Administrator regarding information shown on Notices of Estimated Settlement Share [45 days after mailing of Class Notice Packets]:	_____
Deadline for Parties to jointly file Motion for Final Approval of Class Action Settlement:	_____
Final Approval Hearing:	_____

14. Pending the Final Approval 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: _____.

_____
The Honorable Charles F. Adams
Judge of the Superior Court