

1 Tuvia Korobkin (SBN 268066)
tuvia@marqueelaw.com
2 F. Shawn Azizollahi (SBN 268116)
shawn@marqueelaw.com
3 Neil M. Larsen (SBN 276490)
neil@marqueelaw.com
4 MARQUEE LAW GROUP, A Professional Corporation
9100 Wilshire Boulevard, Suite 445 East Tower
5 Beverly Hills, California 90212
Telephone: 310.275.1844
6 Fax No.: 310.275.1801

7 Attorneys for Plaintiff
ISAIAH BARRERA
8

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF CONTRA COSTA**

12 ISAIAH BARRERA, on behalf of himself and
13 all others similarly situated,

14 Plaintiff,

15 vs.

16
17 PACIFIC STATES PETROLEUM, INC., a
California corporation; and DOES 1 through
18 100, inclusive

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. C25-00659

CLASS ACTION

*Assigned for all Purposes to the Hon.
Benjamin T. Reyes II, Dept. 16*

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

Date: _____, 2026

Time: _____

Dept.: 16

Complaint Filed: March 7, 2025

Trial date: None Set

1 The Motion of Plaintiff Isaiah Barrera (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement (the “Motion”) came on regularly for hearing before this Court on
3 _____ [date] at _____ [time]. This Court has considered the proposed
4 Settlement Agreement (the “Settlement”) between Plaintiff and Defendant Pacific States
5 Petroleum, Inc. (“Defendant” or “PSP”) (together with Plaintiff, the “Parties”) attached as Exhibit
6 1 to the Declaration of Tuvia Korobkin filed concurrently with the Motion. The Court has also
7 considered the Motion, Memorandum of Points and Authorities in support thereof, and supporting
8 declarations filed therewith.

9 In light of the foregoing, and GOOD CAUSE appearing, the Court HEREBY ORDERS
10 AS FOLLOWS:

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

18 Reimbursement Sub-Class: All current and former non-exempt employees who
19 worked for PSP in California at any time from March 7, 2021 through April 10,
2026 (the “Reimbursement Class Period”).

20 Wage Statement Sub-Class: All current and former non-exempt employees who
21 worked for PSP in California at any time from August 18, 2024 through April 10,
22 2026 (the “Wage Statement Class Period”) and who were issued at least one wage
23 statement that counted meal period premiums, holiday pay, sick pay, “Oth
Guaranteed” pay, floating holiday pay, bereavement pay, Miscellaneous pay,
and/or PTO in its calculation of total hours worked (“Affected Wage Statements”).

24 2. For purposes of the Settlement, the Court designates Plaintiff as the Class
25 Representative, and the Court designates Tuvia Korobkin, F. Shawn Azizollahi, and Neil M.
26 Larsen of Marquee Law Group, APC as Class Counsel.

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

1 4. The Court approves, as to form and content, the Notice of Pendency of Class
2 Action and Proposed Settlement (“Class Notice”) and Notice of Estimated Settlement Award
3 attached as Exhibits A and B, respectively, to the Settlement (together, the “Notice Packet”).

4 5. The Court finds that the form of notice to the Settlement Class regarding the
5 pendency of the action and of the Settlement, and the methods of giving notice to members of the
6 Settlement Class, constitute the best notice practicable under the circumstances, and constitute
7 valid, due, and sufficient notice to all of the Settlement Class members. The form and method of
8 giving notice complies fully with the requirements of California Code of Civil Procedure section
9 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California
10 and United States Constitutions, and other applicable law.

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

13 7. The procedures and requirements for filing objections in connection with the Final
14 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
15 presentation of any valid objection to the Settlement in accordance with due process.

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

18 9. The Final Approval Hearing on the question of whether the Settlement should be
19 finally approved as fair, reasonable, and adequate is scheduled in Department 16 of this Court,
20 located at 725 Court Street, Martinez, California 94553 on _____ at _____
21 a.m./p.m.

22 10. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
23 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
24 a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff’s
25 application for reasonable attorneys’ fees, reimbursement of litigation expenses, enhancement
26 award to Plaintiff, settlement administration costs, and payment to the Labor & Workforce
27 Development Agency (“LWDA”) for penalties under the Labor Code Private Attorneys General
28 Act (“PAGA”) should be granted.

11. 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 enhancement award, payment to the LWDA, and settlement administration costs, prior to the Final Approval Hearing according to the schedule set forth below.

12. An implementation schedule is below:

Event	Date
Defendants to provide Class Data to Settlement Administrator no later than:	10 Court days after preliminary approval
Settlement Administrator to mail Notice Packets to Settlement Class members no later than:	10 Court days after receipt of Class Data
Deadline for Settlement Class members to submit requests for exclusion, objections, or disputes:	60 days after Notice mailing
Deadline for Plaintiff to file Motion for Final Approval:	16 Court days prior to Final Approval Hearing
Final Approval Hearing:	_____

13. 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.

14. 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: _____

Hon. Benjamin T. Reyes, II
Judge of the Superior Court