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

ADRIAN ANDERSON, BRANDY TRUJILLO,
ALYSSA TRUJILLO, KERRI BYERS,
ARSHANE TYERRA KING, MISTA LA SHEA
JOHNSON, EUGENA YOLANDA RICHARD,
and DANIELA HERNANDEZ, individually, on
behalf of all others similarly situated, the State of
California, and other aggrieved employees,

Plaintiffs,

v.

PRESTIGE SENIOR LIVING, L.L.C., a Limited
Liability Company; PRESTIGE CARE, INC., a
corporation; LANCASTER VENTURES, L.L.C.,
a Limited Liability Company; PRESTIGE
ASSISTED LIVING AT LANCASTER, an
unknown entity; CHICO VENTURES, L.L.C., a
Limited Liability Company; MANTECA
VENTURES ALF, L.L.C., a Limited Liability
Company; MARYSVILLE VENTURES, L.L.C.,
a Limited Liability Company; OROVILE
ASSISTED LIVING, L.L.C., a Limited Liability
Company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV15087

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

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

Preliminary Approval Hearing:

Date: January 7, 2026

Time: 10:30 a.m.

Dept.: 1

Complaint filed: June 28, 2023

FAC filed: July 6, 2026

Trial date: Not set

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1 **[PROPOSED] ORDER**

2 Having reviewed Plaintiffs Adrian Anderson, Brandy Trujillo, Alyssa Trujillo, Kerri Byers,
3 Arshane Tyerra King, Misty La Shea Johnson, Eugena Yolanda Richard, and Daniela Hernandez's
4 (collectively, the "Plaintiffs") Motion for Preliminary Approval of Class Action and PAGA
5 Settlement ("Motion"), the Declaration of Benjamin H. Haber, Plaintiffs' Declarations, and the Class
6 Action and PAGA Settlement Agreement ("Settlement Agreement"), and good cause appearing, the
7 Court finds and orders as follows:

8 1. The Court finds on a preliminary basis that the Settlement Agreement appears to be
9 fair, adequate, and reasonable and therefore meets the requirements for preliminary approval. The
10 Court grants preliminary approval of the Settlement and the Settlement Class based on the terms set
11 forth in the Settlement Agreement between Plaintiffs and Defendants Prestige Senior Living, L.L.C.,
12 Prestige Care, Inc., Lancaster Ventures, L.L.C., Prestige Assisted Living at Lancaster, Chico
13 Ventures, L.L.C., Manteca Ventures Alf, L.L.C., Marysville Ventures, L.L.C., and Oroville Assisted
14 Living L.L.C. (collectively, the "Defendants"), attached to the Declaration of Benjamin H. Haber in
15 Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement as
16 **Exhibit 2.**

17 2. The Settlement falls within the range of reasonableness of a settlement which could
18 ultimately be given final approval by this Court, and appears to be presumptively valid, subject only
19 to any objections that may be raised at the Final Approval Hearing and final approval by this Court.
20 The Court notes that Defendants have agreed to create a common fund of \$795,000.00 to cover (a)
21 settlement payments to Class Members who do not validly opt out; (b) a \$20,000.00 allocation
22 toward civil penalties under the Labor Code Private Attorneys General Act of 2004 ("PAGA"), 75%
23 of which (\$15,000.00) will be paid to California's Labor and Workforce Development Agency and
24 25% of which (\$5,000.00) will be paid to Aggrieved Employees; (c) Class Representative Service
25 Payments of up to \$15,000 each for Plaintiffs Adrian Anderson, Brandy Trujillo, Alyssa Trujillo and
26 Kerri Byers, and \$5,000 each for Plaintiffs Areshanae Tyerra King, Misty La Shea Johnson, Eugena
27 Yolanda Richard, and Daniela Hernandez; (d) Class Counsel's attorneys' fees, not to exceed one
28 third (1/3) of the Gross Settlement Amount (currently estimated to be \$265,000.00), and up to

1 \$95,000.00 in costs for actual litigation expenses incurred by Class Counsel; and (e) administration
2 costs of up to \$15,279.00.

3 3. The Court preliminarily finds that the terms of the Settlement appear to be within the
4 range of possible approval, pursuant to California Code of Civil Procedure section 382 and applicable
5 law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair and reasonable to
6 the Class Members when balanced against the probable outcome of further litigation relating to class
7 certification, liability and damages issues, and potential appeals; (2) significant informal discovery,
8 investigation, research, and litigation have been conducted such that counsel for the Parties at this
9 time are able to reasonably evaluate their respective positions; (3) settlement at this time will avoid
10 substantial costs, delay, and risks that would be presented by the further prosecution of the litigation;
11 and (4) the proposed Settlement has been reached as the result of intensive, serious, and non-collusive
12 negotiations between the Parties with the assistance of a well-respected class action mediator.
13 Accordingly, the Court preliminarily finds that the Settlement Agreement was entered into in good
14 faith.

15 4. A final approval hearing on the question of whether the proposed Settlement,
16 attorneys' fees and costs to Class Counsel, payment to the LWDA and Aggrieved Employees for
17 their share of the settlement of claims for penalties under PAGA, and the Class Representative
18 Service Payments should be finally approved as fair, reasonable and adequate as to the members of
19 the Class is hereby set in accordance with the Implementation Schedule set forth below.

20 5. The Court provisionally certifies for settlement purposes only the following class (the
21 "Class"): "all individuals who are or previously were employed by Defendants in California and
22 classified as a non-exempt employee at any time during the Class Period."

23 6. "Class Period" means the period from December 1, 2020, through December 31,
24 2024.

25 7. "Aggrieved Employees" means all individuals who are or previously were employed
26 by Defendants in California and classified as a non-exempt employee at any time during the PAGA
27 Period.

28 8. "PAGA Period" means the period from January 30, 2023, through December 31,

2024.

9. The Court finds, for settlement purposes only, that the Class meets the requirements for certification under California Code of Civil Procedure § 382 in that: (1) the Class Members are so numerous that joinder is impractical; (2) there are questions of law and fact that are common, or of general interest, to all Class Members, which predominate over individual issues; (3) Plaintiffs' claims are typical of the claims of the Class Members; (4) Plaintiffs and Class Counsel will fairly and adequately protect the interests of the Class Members; and (5) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

10. The Court appoints as Class Representatives, for settlement purposes only, Plaintiffs Adrian Anderson, Brandy Trujillo, Alyssa Trujillo, Kerri Byers, Arshane Tyerra King, Misty La Shea Johnson, Eugena Yolanda Richard, and Daniela Hernandez. The Court further preliminarily approves Plaintiffs' ability to request a Class Representative Service Payments up to \$15,000 each for Plaintiffs Adrian Anderson, Brandy Trujillo, Alyssa Trujillo and Kerri Byers, and \$5,000 each for Plaintiffs Areshanae Tyerra King, Misty La Shea Johnson, Eugena Yolanda Richard, and Daniela Hernandez.

11. The Court appoints, for settlement purposes only, Benjamin H. Haber, Daniel J. Kramer, Chase M. Stern, and Trenten Bilodeaux of Wilshire Law Firm, PLC and Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman, Sergio J. Puche, Trevor G. Moran of Blumenthal Nordrehaug Bhowmik De Blouw LLP, as Class Counsel. The Court further preliminarily approves Class Counsel's ability to request attorneys' fees of up to one third (1/3) of the Gross Settlement Amount (currently estimated to be \$265,000.00), and costs not to exceed \$95,000.00.

12. The Court appoints Apex Class Action LLC as the Settlement Administrator with reasonable administration costs not to exceed \$15,279.00.

13. The Court approves, as to form and content the Class Notice ("Class Notice") attached to the Settlement Agreement as **Exhibit A**. The Court finds on a preliminary basis that plan for distribution of the Class Notice to Class Members satisfies due process, provides the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons

entitled thereto.

14. The Parties and the Administrator are ordered to carry out the Settlement according to the terms of the Settlement Agreement.

15. Any Class Member who does not timely and validly request exclusion from the Settlement may object to the Settlement Agreement.

16. The Court orders the following Implementation Schedule:

Event	Timing
Class Data: Last day for Defendants to provide Class Data to the Administrator	15 days after the Court grants Preliminary Approval of the Settlement
Class Notice: Last day for Administrator to mail the Class Notice to Class Members	14 days after receipt of the Class Data
Response Deadline: Last day for Class Members to submit Requests for Exclusion, Objections to the Settlement, and challenges to Workweeks and/or Pay Periods	60 days after Class Notice is mailed out by the Administrator (with an additional 14 days for Class Members whose Class Notice was remailed)
Filing Deadline: Last day to file Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payments to Plaintiffs	16 court days before the Final Approval Hearing
Final Approval Hearing	_____, 2026, at _____ a.m./p.m. in Dept. 1 of the above-referenced Court

17. The Court further ORDERS that, pending further order of this Court, all proceedings in this lawsuit, except those contemplated herein and in the settlement, are stayed.

IT IS SO ORDERED.

DATED: _____

HON. THERESA M. TRABER
JUDGE OF THE SUPERIOR COURT