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Attorneys for Plaintiffs

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

JENNIFER RAHAIM, LIZBETH MARTINEZ,
and FIONA KING, as individuals and on behalf
of all others similarly situated,

Plaintiffs,

vs.

LANGHAM HOTELS PACIFIC
CORPORATION dba THE LANGHAM
HUNTINGTON, PASADENA, a Delaware
corporation; and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 25STCV10715 (Related to cases
25SCV17624 and 25STCV24715)

*[Case assigned for all purposes to the Hon.
Samantha P. Jessner, Dept. SSC-7]*

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

Date: January 27, 2027
Time: 10:00 a.m.
Dept.: SSC-7

Complaint Filed: April 9, 2025
Trial Date: None Set

1 The Motion of Plaintiffs Jennifer Rahaim, Lizbeth Martinez, and Fiona King (collectively,
2 “Plaintiffs”) for Preliminary Approval of Class Action Settlement came on regularly for hearing
3 before this Court on January 27, 2027 at 10:00 a.m. This Court, having considered the proposed
4 Stipulation of Settlement (the “Settlement”), attached as Exhibit 1 to the Declaration of Sean M.
5 Blakely filed concurrently herein; having considered Plaintiffs’ Motion for Preliminary Approval
6 of Class Action Settlement, Memorandum of Points and Authorities in support thereof, and
7 supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE
8 FOLLOWING:

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

16 All current and former non-exempt employees who worked for
17 Defendant Langham Hotels Pacific Corporation dba The Langham
18 Huntington, Pasadena in California at any time from April 17, 2023
through preliminary approval (the “Class Period”).

19 2. For purposes of the Settlement, the Court designates named Plaintiffs Jennifer
20 Rahaim, Lizbeth Martinez, and Fiona King as Class Representatives, and designates Paul K.
21 Haines, Sean M. Blakely, and Alexandra R. McIntosh of Haines Law Group, APC, and Jonathan
22 M. Genish, Miriam L. Schimmel, Joana Fang, Jared C. Osborne, Kyle W. Wilson, Alexandra
23 Rose, and Jasmine Y. Kianfard of Blackstone Law, APC as Class Counsel.

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

26 4. The Court approves, as to form and content, the Class Notice and Notice of
27 Estimated Settlement Payment (collectively, the “Notice Packet”), attached as Exhibit A to the
28 Settlement.

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

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

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

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

16 9. The Class Notice shall provide at least forty-five (45) calendar days' notice for
17 members of the Settlement Class to opt out of, or object to the Settlement.

18 10. The Final Fairness Hearing on the question of whether the Settlement should be
19 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-7 of this Court,
20 located at 312 North Spring Street, Los Angeles, California 90012 on _____ at
21 _____.

22 11. At the Final Fairness 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 Plaintiffs'
25 application for reasonable attorneys' fees, reimbursement of litigation expenses, Class
26 Representative Enhancement Payments to Plaintiffs, settlement administration costs, and
27 payment to the Labor & Workforce Development Agency ("LWDA") for penalties under the
28 Labor Code Private Attorneys General Act 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, Plaintiffs' Class Representative Enhancement Payments, payment to the LWDA, 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 based on the January 27, 2027 hearing date is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [15 business days after preliminary approval]:	February 18, 2027
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	March 4, 2027
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement, or submit a dispute [45 calendar days after mailing]:	April 19, 2027
Deadline for Plaintiffs to file their Motion for Final Approval of Class Action Settlement:	16 court days prior to Final Fairness Hearing.
Final Fairness Hearing:	_____, 2027

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. Samantha P. Jessner
Judge of the Superior Court