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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

REMBER GUILLEN and JUAN SALAS, as
individuals and on behalf of all others
similarly situated,

Plaintiff,

vs.

MOBILE CLEAR SHIELD, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,
Defendants.

Lead Case No.: 22STCV31784

Related to Case No.: 22STCV31788

*[Assigned for all purposes to the Hon. David
S. Cunningham III, Dept. SSC-11]*

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

Date: May 22, 2024
Time: 10:00 a.m.
Dept.: SSC-11

1 The Motion of Plaintiffs Rember Guillen and Juan Salas (“Plaintiffs”) for Preliminary Approval
2 of Class Action Settlement will come on regularly for hearing before this Court on May 22, 2024 at
3 10:00 a.m. The Court, having considered the proposed Class Action and PAGA Settlement Agreement
4 and Class Notice (the “Settlement”), attached as Exhibit 2 to the Declaration of Scott M. Lidman filed
5 concurrently with the Motion; having considered Plaintiffs’ Motion for Preliminary Approval of Class
6 Action Settlement, Memorandum of Points and Authorities in support thereof, and supporting
7 declarations filed therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All individuals whom Defendant Mobile Clear Shield, LLC classified as
16 independent contractors and who worked for Defendant in California at any
time from September 28, 2018 through January 31, 2020.

17 2. For purposes of the Settlement, the Court designates named Plaintiffs Rember Guillen
18 and Juan Salas as Class Representatives, and Scott M. Lidman, Elizabeth Nguyen, and Milan Moore of
19 Lidman Law, APC and Paul Haines of Haines Law Group, APC as Class Counsel.

20 3. The Court designates Phoenix Class Action Administration Solutions as the third-party
21 Settlement Administrator for mailing notices.

22 4. The Court approves, as to form and content, the Class Notice, which means the Court
23 Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval and is attached
24 to the Settlement as Exhibit A.

25 5. The Court finds that the form of notice to the Class regarding the pendency of the action
26 and of the Settlement, and the methods of giving notice to members of the Class, constitutes the best
27 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all members
28 of the Class. 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 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 Fairness 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 Class Members.

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

9. The Class Notice shall provide at least 60 calendar days' notice for members of the Class 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 11 of this Court, located at 312 North Spring Street, Los Angeles, California, 90012 on _____, 2024 at _____ a.m. / p.m.

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 Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs' application for reasonable attorneys' fees, reimbursement of litigation expenses, service awards to Plaintiffs, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act ("PAGA") 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' service awards, settlement administration costs, and payment to the LWDA for PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

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13. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to Settlement Administrator	20 calendar days after issuance of the preliminary approval order
Settlement Administrator to mail Class Notice to Class Members	14 calendar days after receiving Class Information from Defendant
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator
Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement:	
Final Fairness Hearing:	_____, 2024 at _____ a.m./p.m.

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: _____, 2024

Honorable David S. Cunningham III
Judge of the Superior Court