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DANIEL A. TARACENA ROBLEDO, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

(UNLIMITED JURISDICTION)

DANIEL A. TARACENA ROBLEDO, on
behalf of himself and all others similarly
situated, and the general public, and as an
“Aggrieved Employee” on behalf of other
“Aggrieved Employees” under the Private
Attorneys General Act of 2004,

Plaintiff(s),

vs.

PLENITUDE FOOD CRAFTS, LLC; and
DOES 1 to 25, inclusive,

Defendant(s).

Case No.: 25CV133325

*[Assigned for all purposes to The Honorable
S. Raj Chatterjee, Dept. 21]*

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

Action filed: 07/22/2025

Hearing Date: 08/04/2026

Hearing Time: 2:30 p.m.

Hearing Dept: 21, Hon. S. Raj Chatterjee

Reservation ID: 500844714572

1 Plaintiff Daniel A. Taracena Robledo (“Plaintiff”) unopposed Motion for Preliminary
2 Approval of Stipulation for Class Action and PAGA Settlement and Release of Claims was
3 scheduled for hearing before the Court on August 4, 2026, at 2:30 p.m., before the Honorable S.
4 Raj Chatterjee, Judge presiding.

5 The Court, having considered the Stipulation for Class Action and PAGA Settlement
6 and Release of Claims (“Settlement”), executed by the Parties on July 13, 2026 and attached as
7 Exhibit 1 to the Declaration of Maralle Messrelian filed on July 13, 2026, and the exhibits
8 attached thereto; having considered Plaintiff’s Unopposed Motion for Preliminary Approval of
9 Class Action and PAGA Settlement, memorandum of points and authorities, supporting
10 declarations filed therewith, and good cause appearing thereto, HEREBY ORDERS THE
11 FOLLOWING:

12
13 1. The Court grants preliminary approval of the Settlement and the Class based upon
14 the terms set forth in the Settlement filed previously. All capitalized terms used herein shall
15 have the same meaning as defined in the Settlement. The Court has determined there is
16 sufficient evidence to suggest that (a) the terms of the Settlement might be fair, adequate, and
17 reasonable to the Class and (b) the Settlement falls within the range of reasonableness and
18 appears to be presumptively valid, subject only to any objections that may be raised at the final
19 hearing and final approval by this Court. The Court will make a determination at the Final
20 Approval Hearing of whether the Settlement is fair, adequate and reasonable to the Class.

21 2. For purposes of this Order, the Class is defined as follows:

22 The “Settlement Class” or “Class Member(s)” means all current and former non-
23 exempt, hourly paid employees who worked for Defendant Plenitude Food Crafts,
24 LLC in California at any time during the Class Period. “Class Period” means the
time from July 22, 2021 to June 30, 2025.

25 The Class is preliminarily certified for settlement purposes only.

26 3. The Court hereby preliminarily finds that the Settlement was the product of
27 serious, informed, non-collusive negotiations conducted at arm’s length by the Parties. In
28 making this preliminary finding, the Court considered the nature of the claims set forth in the

1 pleadings, the amounts and kinds of benefits which shall be paid pursuant to the Settlement, the
2 allocation of Settlement proceeds to the Class, and the fact that the Settlement represents a
3 compromise of the Parties' respective positions. The Court further preliminarily finds that the
4 terms of the Settlement have no obvious deficiencies and do not improperly grant preferential
5 treatment to any individual Class Member. Accordingly, the Court preliminarily finds that the
6 Settlement was entered into in good faith.

7 4. The Court finds that the dates set forth in the Settlement for mailing and
8 distribution of the Class Notice meet the requirements of due process and provide the best notice
9 practicable under the circumstances, and constitute due and sufficient notice to all persons
10 entitled thereto, and directs the mailing of the Class Notice by first class mail to the Class as set
11 forth in the Settlement. Accordingly, the Court orders the following implementation schedule for
12 further proceedings:

13 a. Within fifteen (15) days following the date of this Preliminary Approval
14 Order, Defendant shall provide ILYM Group, Inc., the appointed Settlement Administrator, the
15 Class Data with the following information about each Class Member: (1) full name; (2) most
16 recent mailing address and telephone number; (3) Social Security Number; (4) dates of
17 employment; (5) the respective number of Workweeks that each Class Member worked during
18 the Class Period and the number of PAGA Pay Periods worked during the PAGA Period.

19 b. Within fifteen (15) calendar days after the receipt of the Class Data, the
20 Settlement Administrator shall be responsible for calculating the estimated payouts to the Class
21 Members assuming all Class Members participate in the Settlement.

22 c. Within fifteen (15) calendar days after the receipt of the Class Data, the
23 Settlement Administrator shall mail the Class Notice to all Class Members pursuant to the terms
24 of the Settlement, by First Class regular U.S. mail. Prior to mailing, the Settlement Administrator
25 will perform a search based on the National Change of Address Database for information to
26 update and correct any known or identifiable address changes.
27
28

1 d. Within forty-five (45) calendar days following the mailing of the Class
2 Notice, all requests to be excluded from the Settlement must be returned to the Settlement
3 Administrator via email or postmarked by U.S. Mail, as set forth in the Settlement. Those Class
4 Members who receive a re-mailed Class Notice, will have either (a) fifteen (15) calendar days
5 from the date of re-mailing or (b) until the Response Deadline, whichever is later, to submit a
6 Request for Exclusion. The Settlement Administrator shall file a declaration concurrently with
7 the filing of any motion for final approval of the Settlement authenticating a copy of every
8 Request for Exclusion received by the Settlement Administrator.

9 e. Within forty-five (45) calendar days following the mailing of the Class
10 Notice, all written objections to the Settlement should be mailed to the Settlement Administrator
11 and should state the basis for the objection. Those Class Members who receive a re-mailed Class
12 Notice, will have either (a) fifteen (15) calendar days from the date of re-mailing or (b) until the
13 Response Deadline, whichever is later, to submit an objection to the Settlement. The Settlement
14 Administrator shall forward a copy of the objection to counsel for the parties within two (2)
15 business days of receipt. The Settlement Administrator shall file a declaration concurrently with
16 the filing of any motion for final approval of the Settlement authenticating a copy of every
17 Notice of Objection received by the Settlement Administrator. The Court will consider any
18 written or oral objections or comments from Class Members at the time of the Final Approval
19 Hearing, as set forth in the Class Notice. Class Members may appear at the final approval
20 hearing to be heard on their objections, even if they have not previously served a written
21 objection.
22

23 5. The Court approves, as to form and content, the Notice of Class Action
24 Settlement, attached as Exhibit A to this Order. The Court also approves the procedure for
25 members of the Class to object to the Settlement set forth in the Class Notice.

26 6. The Court approves, for settlement purposes only, Maralle Messrelian of MM
27 Law, APC as Class Counsel.
28

7. The Court approves, for settlement purposes only, Plaintiff Daniel A. Taracena Robledo as the Class Representative.

8. The Court approves ILYM Group, Inc. as the Settlement Administrator and orders ILYM Group, Inc. to perform the duties described in Paragraph 9 and its subparts.

9. A Final Approval Hearing shall be held at _____ a.m./p.m. on _____, 2026 in Department 21 of the Superior Court for the State of California, County of Alameda, located at 1221 Oak Street, Oakland, CA 94612, to consider the fairness, adequacy and reasonableness of the proposed Settlement preliminarily approved by this Order, and to consider the application of Class Counsel for an award of reasonable attorneys' fees and costs incurred and the Class Representative Enhancement Payment. All briefs and materials in support of the Motion for an Order of Final Approval and Judgment and Application for Attorneys' Fees and Costs shall be filed with this Court sixteen (16) court days prior to the final approval hearing.

10. If for any reason the Court does not execute and file an Order of Final Approval and Judgment, or if the Final Effective Date, as defined in the Settlement, does not occur for any reason, the proposed Settlement that is the subject of this Order, and all evidence and proceedings had in connection therewith, shall be without prejudice to the status quo ante rights of the Parties to the litigation, as more specifically set forth in the Settlement.

11 The Court expressly reserves the right to adjourn or continue the Fairness Hearing from time to time without further notice to members of the Class. The Settlement Administrator shall give prompt notice of any continuance to Class Members who object to the Settlement.

IT IS SO ORDERED.

Date: _____, 2026

Honorable S. Raj Chatterjee
Judge of the Alameda Superior Court