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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

ALEXANDRO MORA, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

PRIME TECH CABINETS, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 30-2022-01289157-CU-OE-CXC

*[Assigned for all purposes to the Hon. Melissa
R. McCormick, Dept. CX104]*

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

Date: June 20, 2024
Time: 2:00 p.m.
Dept.: CX104

Complaint Filed: October 31, 2022
Trial Date: None Set

1 The Motion of Plaintiff Alexandro Mora (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement came on regularly for hearing before this Court on June 20, 2024 at 2:00 p.m.
3 This Court, having considered the proposed Stipulation of Settlement (the “Settlement”) attached
4 to the Declaration of Sean M. Blakely filed concurrently herein; having considered Plaintiff’s
5 Motion for Preliminary Approval of Class Action Settlement, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause
7 appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All current and former non-exempt employees who worked for
16 Defendant Prime Tech Cabinets, Inc. in California from October 31,
17 2018 until the date of preliminary approval of the settlement (“Class
Period”).

18 2. For purposes of the Settlement, the Court designates named Plaintiff Alexandro
19 Mora as Class Representative, and designates Paul K. Haines and Sean M. Blakely of Haines Law
20 Group, APC as Class Counsel.

21 3. The Court designates Phoenix Settlement Administrators as the third-party
22 Settlement Administrator for mailing notices.

23 4. The Court approves, as to form and content, the Class Notice and Request for
24 Exclusion Form (collectively, the “Notice Packet”), attached as Exhibits 1 and 2, respectively, to
25 the Settlement.

26 5. The Court finds that the form of notice to the Settlement Class regarding the
27 pendency of the action and of the Settlement, and the methods of giving notice to members of the
28 Settlement Class, constitute the best notice practicable under the circumstances, and constitute

valid, due, and sufficient notice to all of the Settlement Class members. 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 the Settlement 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 Settlement Class member's objection to the Settlement in accordance with the due process rights of all members of the Settlement Class.

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

9. The Class Notice shall provide at least sixty (60) calendar days' notice for Settlement Class members 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 CX-104 of this Court, located at 751 West Santa Ana Boulevard, Santa Ana, California 92701 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 Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, enhancement payment to Plaintiff, settlement administration costs, and payment to the Labor & Workforce Development Agency ("LWDA") for penalties under the 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, Plaintiff's enhancement payment, 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 is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [10 business days after preliminary approval]:	July 5, 2024
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	July 19, 2024
Deadline for Settlement Class members to request exclusion from, submit a dispute, or object to, the Settlement [60 calendar days after mailing]:	September 17, 2024
Deadline for Plaintiff to file his Motion for Final Approval of Class Action Settlement:	October 15, 2024
Final Fairness Hearing:	_____, 2024

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

Hon. Melissa R. McCormick
Judge of the Superior Court