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Attorneys for Plaintiff MARISA REFE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

MARISA REFE, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

v.

STARK 2 LLC; SYNERGY TRAINING
CENTERS LLC, STARK MGT, LLC, TODD
VANDE HEI, and DOES 1 through 50,
Inclusive,

Defendants.

FILED
Superior Court of California
County of Los Angeles
01/21/2026

David W. Slayton, Executive Officer / Clerk of Court
By: A. Morales Deputy

CASE NO: 22STCV29855
Hon. Samantha P. Jessner
Dept: 7

~~PROPOSED~~ ORDER

*[Filed concurrently with Plaintiff's
Supplemental Brief; Supplemental Declaration
of Miranda A. Mossavar]*

Date: January 21, 2026
Time: 10:00 a.m.
Dept.: 7

Date Filed: September 13, 2022
Trial Date: None Set

1 The unopposed motion by Plaintiff Marisa Refe (“Plaintiff”) for preliminary approval of the
2 proposed class action settlement agreement (the “Agreement”) came on for hearing before this Court
3 on May 7, 2025, at 10:00 a.m., and for further supplemental briefing on September 9, 2025 at 10:00
4 a.m. and January 21, 2026 at 10:00 a.m. The Court, having considered all papers filed in connection
5 with the motion, all argument of counsel, and, good cause appearing, hereby **ORDERS** as follows;

6 1. This Preliminary Approval Order incorporates the Agreement, and the terms used herein
7 shall have the meanings and/or definitions given to them in the Agreement, as submitted to the Court
8 with the motion.

9 2. For purposes of the Settlement and conditioned upon the Settlement receiving final approval
10 following the final approval hearing, this Court hereby conditionally certifies the Settlement Class,
11 defined as: “all non-exempt employees who worked either directly or via a staffing agency for one
12 or more of the Corporate Defendants in California from September 13, 2018, until March 3, 2024.”

13 3. The Court finds that for the purposes of settlement: (a) the number of members of the
14 Settlement Class are so numerous that joinder is impracticable; (b) there are questions of law and
15 fact common to members of the Settlement Class; (c) the claims of the Plaintiff are typical of the
16 claims of the members of the Settlement Class; (d) the Plaintiff are adequate representatives for the
17 Settlement Class, and have retained experienced and adequate Class Counsel; (e) the questions of
18 law and fact common to the members of the Settlement Class predominate over any questions
19 affecting any individual members; and (f) a class action is superior to the other available methods
20 for the fair and efficient adjudication of the controversy.

21 4. For the purposes of settlement only, the Court finds and determines that the named Plaintiff
22 will fairly and adequately represent the interests of the Settlement Class in enforcing their rights in
23 the action and appoints them as Class representatives.

24 5. For purposes of settlement only, the Court appoints as Class Counsel the law firms of
25 Mossavar Law, P.C. and Forootan Law Corp. 06/04/2026 at 10:00 a.m.

26 6. The Final Approval Hearing Date shall be for before the Honorable Samantha
27 P. Jessner in Department 7, Superior Court of Los Angeles, located at 312 N. Spring Street, Los
28 Angeles, California 90012, to consider: (a) the fairness, reasonableness and adequacy of the

1 proposed Agreement; (b) any objections made by Settlement Class members to the proposed
2 Agreement; (c) whether the Agreement should be finally approved by this Court; (d) Class
3 Counsel's motion for attorneys' fees and costs; (e) the motion seeking a service award for the
4 Plaintiff as Class Representative; and (f) such other matters as this Court may deem proper and
5 necessary.

06/04/2026 at 10:00 a.m.

6 7. The Court sets the Final Fairness Hearing for before the Honorable Samantha P.
7 Jessner in Department 7 of this Court to determine whether the Settlement should receive final
8 approval and to consider Class Counsel's Motion for Fees, Costs, and Service Awards.

9 8. The Notice, as set forth in **Exhibit A** to the Agreement and to be issued in the manner
10 described in the Agreement, is the best notice practicable, and is reasonably calculated, under the
11 circumstances, to apprise the members of the Class of the pendency of this action and their right to
12 participate in, object to, or exclude themselves from the settlement. This Court further finds that the
13 Notice, as set forth in **Exhibit A** to the Agreement, is sufficient notice of the Final Approval Hearing
14 date, the settlement, the Motion for Final Approval and Motion for Fees, Costs, and Service Award,
15 and other matters set forth in the Agreement, and that the Notice set forth in **Exhibit A** of the
16 Agreement fully satisfies the California Rules of Court and due process of law, to all persons entitled
17 thereto.

18 9. The Court preliminarily approves the settlement of the PAGA Claim and the allocation of
19 the PAGA Payment as outlined in the Settlement Agreement. The Court further orders that no class
20 or PAGA release shall become effective unless and until Defendants have fully funded the Gross
21 Settlement Amount in accordance with the Settlement Agreement.

22 10. The Court approves ILYM Group, Inc., as the Settlement Administrator for purposes of
23 administering the Settlement.

24 11. ILYM Group, Inc. is appointed as Claims Administrator. The Claims Administrator shall
25 abide by the terms and conditions of the Agreement that pertain to the Claims Administrator.

26 12. The Court directs the Settlement Administrator to mail the Class Notice to Class Members
27 by first-class mail in accordance with the terms of the Settlement Agreement.

28 13. Settlement Class Members who wish to assert objections or exclude themselves from the

Settlement Class for purposes of this settlement may do so by submitting a request to the Claims Administrator only, in the manner and within the time period set forth in the Notice.

14. The Court orders that any responses to objections to the Settlement must be filed and served no later than five (5) court days before the Final Fairness Hearing.

15. Pending final determination of whether the Settlement should be approved, the Court enjoins Plaintiff, all Class Members, and anyone acting on their behalf who have actual knowledge of this Settlement, from instituting, commencing, or continuing to prosecute, directly or indirectly, any action in this Court or any other forum asserting claims that are Released Claims under the Settlement Agreement, except as provided for in the Settlement or by further order of this Court.

Summary of Applicable Dates

- 1. Defendants' Delivery of Class Data to Administrator:** No later than thirty (30) days after the Court grants Preliminary Approval of the Settlement
- 2. Deadline to Send Notice to the Class:** Using best efforts to perform as soon as possible, and in no event later than fourteen (14) days after receiving the Class Data.
- 3. Claims Deadline:** Within fourteen (14) days after Defendants fund the Gross Settlement Amount, the Administrator will mail checks for all Individual Class Payments, all Individual PAGA Payments, the LWDA PAGA Payment, the Administration Expenses Payment, the Class Counsel Fees Payment, the Class Counsel Litigation Expenses Payment, and the Class Representative Service Payment.
- 4. Objection Deadline:** forty-five (45) days after the Administrator mails Notice to Class Members and Aggrieved Employees; Class Members to whom Notice Packets are resent after having been returned undeliverable to the Administrator shall have an additional fourteen (14) calendar days beyond the Response Deadline has expired.
- 5. Exclusion (Opt-Out) Deadline:** no later than forty-five (45) days after the Administrator mails the Class Notice (plus an additional fourteen (14) days for Class Members whose Class Notice is re-mailed).
- 6. Deadline to Respond to Objections and Move for Final Approval:** No later than five (5) court days prior to the Final Approval Hearing, or as otherwise ordered or accepted by the

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Court.

7. Filing Motion for Final Approval: No later than sixteen (16) court days before the calendared Final Approval Hearing.

8. Final Approval Hearing Date: 06/04/2026 at 10:00 a.m.

01/21/2026

Dated: , ~~2026~~



A handwritten signature in black ink, appearing to read 'S. Jessner'.

Samantha Jessner/Judge

Honorable Samantha P. Jessner