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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF SAN BERNARDINO**

14 KIRSTEN CORBETT and BRENDA  
15 CARDENAS, individually, and on behalf of all  
16 others similarly situated,

17 Plaintiffs,

18 v.

19 G-III APPAREL GROUP, LTD., an entity of  
unknown form; AM RETAIL GROUP, INC., a  
20 corporation; and DOES 1 through 10, inclusive,

21 Defendants.  
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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

DEC - 2 2024

BY Jessica Gancez  
JESSICA GANCEZ, DEPUTY

Case No.: CIVSB2305772

[Hon. Joseph T. Ortiz]

**[PROPOSED] PRELIMINARY APPROVAL  
ORDER**

Action Filed: February 24, 2023  
Trial Date: None Set

1  
2 **[PROPOSED] PRELIMINARY APPROVAL ORDER**

3 The Court now has before it Plaintiffs Kirsten Corbett and Brenda Cardenas' ("Plaintiffs")  
4 unopposed Motion for Preliminary Approval of Class Action Settlement ("Motion"). After reviewing the  
5 Motion, the Class Action Settlement Agreement and Release ("Settlement Agreement")<sup>1</sup> and exhibits  
6 attached thereto, and good cause appearing therefore, the Court hereby finds and orders as follows:

7 1. The Court finds on a preliminary basis that the settlement memorialized in the Settlement  
8 Agreement appears to be fair and adequate, and falls within the range of reasonableness, and therefore  
9 meets the requirement for preliminary approval.

10 2. The Court conditionally certifies for settlement purposes the following Class:

11 All non-exempt employees who worked for Defendant in California during the Class Period.

12 The Class Period is March 3, 2019 to August 17, 2024.

13 3. The Court finds, for settlement purposes only, that the Class meets the requirements for  
14 certification under California Code of Civil Procedure § 382 in that: (a) the Class is so numerous that  
15 joinder is impractical; (b) there are questions of law and fact that are common, or of general interest, to  
16 the Class, which predominate over any individual issues; (c) Plaintiffs' claims are typical of the claims of  
17 the Class; (d) Plaintiffs and their counsel will fairly and adequately protect the interests of the Class; and  
18 (e) a class action is superior to other available methods for the fair and efficient adjudication of the  
19 controversy.

20 4. The Court appoints, for settlement purposes, Plaintiffs as Representatives for the Class.

21 5. The Court appoints, for settlement purposes, the Wand Law Firm, P.C., and Blumenthal  
22 Nordrehaug Bhowmik De Blouw LLP, as Counsel for the Class.

23 6. The Court appoints Simpluris as the Settlement Administrator.

24 7. The Parties are ordered to carry out the Settlement according to the following  
25 implementation schedule:

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27  
28 <sup>1</sup> All capitalized terms have the same meaning as defined in the Settlement Agreement unless otherwise indicated.

| Event                                                                                                                                      | Date                          |
|--------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| Last day for Defendant to provide the Settlement Administrator with the Class Information                                                  |                               |
| Last day for Settlement Administrator to mail Class Notice                                                                                 |                               |
| Last day for Class Members to submit a dispute re. Workweeks, Request for Exclusion, or written Objection                                  |                               |
| Last Day for Plaintiffs to file Motion for Final Approval and Motion for Attorneys' Fees and Costs and Class Representative Service Awards |                               |
| Final Approval Hearing                                                                                                                     | April 9 at 1:30 a.m. / (p.m.) |

8. The Court approves the form and content of the Class Notice and PAGA Notice (attached as Exhibit 1 to the Settlement Agreement). The Parties and the Settlement Administrator are authorized to make non-material edits to these documents, such as inserting dates, estimated payment amounts, etc.

9. The Court finds that the method of giving notice to the Class constitutes the best means practicable of providing notice under the circumstances. The Court further finds that the Class Notice and the method of giving notice to the Class meet the requirements of California Code of Civil Procedure § 382, California Rules of Court, Rules 3.766 and 3.769, and due process under the California and United States Constitutions, and other applicable law.

10. At the Final Approval Hearing, the Court will consider, *inter alia*, whether the Settlement should be finally approved as fair, reasonable and adequate, whether a final judgment should be entered in favor of Plaintiffs, and whether the payments provided for under the Settlement, including attorneys' fees and costs and class representative service awards, should be finally approved and granted.

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1 11. Pending the Final Approval Hearing, all proceedings in this Action, other than  
2 proceedings necessary to implement the Settlement and this Order, are stayed.

3 **IT IS SO ORDERED.**

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5 DATED: Dec. 2, 2024

  
Honorable Joseph T. Ortiz  
Judge of the Superior Court