ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 315664
NAME: Benjamin Haber; Samantha Costa(SBN 346526); Trenten Bilodeaux (SBN 332692)
FIRM NAME: Wilshire Law Firm, PLC
STREET ADDRESS: 660 South Figueroa Street, Sky Lobby
CITY: Los Angeles STATE: CA ZIP CODE: 90017
TELEPHONE NO.: (213) 381-9988 FAX NO.: (213) 381-9989
E-MAIL ADDRESS: rachel.vinson@wilshirelawfirm.com, karen.wallace@wilshirelawfirm.com
ATTORNEY FOR (*name*): Plaintiff Janelle V. Walker

FOR COURT USE ONLY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
STREET ADDRESS: 191 N. First Street
MAILING ADDRESS: 191 N First Street
CITY AND ZIP CODE: San Jose, 95113
BRANCH NAME: Downtown Superior Court

CASE NUMBER: 25CV471528

PLAINTIFF/PETITIONER: Janelle V. Walker
DEFENDANT/RESPONDENT: Northern California Chair Corporation
OTHER:

JUDICIAL OFFICER: Theodore C. Zayner

PROPOSED ORDER (COVER SHEET)

DEPT: 19

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
   Plaintiff Janelle V. Walker

2. Title of the proposed order:
   [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of the Class Action and PAGA Settlement

3. The proceeding to which the proposed order relates is:
   a. Description of proceeding: Motion forPreliminary Approval
   b. Date and time: May 5, 2027 at 1:30 p.m.
   c. Place: Downtown Superior Court at 191 N. First Street, San Jose CA, 95113

4. The proposed order was served on the other parties in the case.

Trenten Bilodeaux
(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY)

Form Adopted for Mandatory Use
Judicial Council of California
EFS-020 [Rev. February 1, 2017]

PROPOSED ORDER (COVER SHEET)
(Electronic Filing)

Cal. Rules of Court,
rules 2.252, 3.1312
www.courts.ca.gov

CASE NAME:	CASE NUMBER:
Janelle V. Walker v. Northern California Chair Corporation	25CV471528

PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER

1. I am at least 18 years old and **not a party to this action.**

   a. My residence or business address is *(specify):*
   660 South Figueroa Street, Sky Lobby, Los Angeles, California 90017

   b. My electronic service address is *(specify):* dariane.rose@wilshirelawfirm.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

   a. On *(name of person served) (If the person served is an attorney, the party or parties represented should also be stated.):*
   Hieu Williams, Esq. (hwilliams@hkemploymentlaw.com) and China M. Daly, Esq. (cdaly@hkemployment.com)

   b. To *(electronic service address of person served):* listed above

   c. On *(date):* 10/21/2026

[x] Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/21/2026

Dariane Rose
(TYPE OR PRINT NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Talar DerOhannessian (SBN 311687)
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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JANELLE V. WALKER, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

NORTHERN CALIFORNIA CHAIR CORPORATION, a California corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 25CV471528

[Assigned for All Purposes to the Honorable Theodore C. Zayner, Dept. 19]

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Preliminary Approval Hearing:
Date: May 5, 2027
Time: 1:30 p.m.
Dept.: 19

Complaint filed: July 25, 2025
FAC filed: December 17, 2025
Trial date: None set

[PROPOSED] ORDER

Having reviewed Plaintiff Janelle V. Walker's ("Plaintiff") Motion for Preliminary Approval of Class Action and PAGA Settlement ("Motion"), the Declaration of Benjamin H. Haber, Plaintiff's Declaration, and the Class Action and PAGA Settlement Agreement ("Settlement Agreement"), and good cause appearing, the Court finds and orders as follows:

1. The Court finds on a preliminary basis that the Settlement Agreement appears to be fair, adequate, and reasonable and therefore meets the requirements for preliminary approval. The Court grants preliminary approval of the Settlement and the Settlement Class based on the terms set forth in the Settlement Agreement between Plaintiff and Defendant Northern California Chair Corporation ("Defendant"), attached to the Declaration of Benjamin H. Haber in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement as **Exhibit 2**.

2. The Settlement falls within the range of reasonableness of a settlement which could ultimately be given final approval by this Court, and appears to be presumptively valid, subject only to any objections that may be raised at the Final Approval Hearing and final approval by this Court. The Court notes that Defendant has agreed to create a common fund of $585,000.00 to cover (a) settlement payments to Class Members who do not validly opt out; (b) a $50,000.00 allocation toward civil penalties under the Labor Code Private Attorneys General Act of 2004 ("PAGA"), 65% of which ($32,500.00) will be paid to California's Labor and Workforce Development Agency and 35% of which ($17,500.00) will be paid to Aggrieved Employees; (c) a Class Representative Service Payment of up to $15,000.00 to Plaintiff; (d) Class Counsel Fees not to exceed one third (1/3) of the Gross Settlement Amount (currently estimated to be $195,000.00), and Class Counsel Costs for actual litigation expenses incurred up to $35,000.00; and (e) Settlement Administration Costs of up to $10,000.00.

3. The Court preliminarily finds that the terms of the Settlement appear to be within the range of possible approval, pursuant to California Code of Civil Procedure section 382 and applicable law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair and reasonable to the Class Members when balanced against the probable outcome of further litigation relating to class certification, liability and damages issues, and potential appeals; (2) significant informal discovery,

investigation, research, and litigation have been conducted such that counsel for the Parties at this time are able to reasonably evaluate their respective positions; (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented by the further prosecution of the litigation; and (4) the proposed Settlement has been reached as the result of intensive, serious, and non-collusive negotiations between the Parties with the assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds that the Settlement Agreement was entered into in good faith.

4. A final approval hearing on the question of whether the proposed Settlement, Class Counsel Fees and Class Counsel Costs, payment to the LWDA and Aggrieved Employees for their share of the settlement of claims for penalties under PAGA, and the Class Representative Service Payment should be finally approved as fair, reasonable and adequate as to the members of the Class is hereby set in accordance with the Implementation Schedule set forth below.

5. The Court provisionally certifies for settlement purposes only the following class (the "Class"): "all hourly-paid non-exempt employees who worked for Defendant in California at any time during the Class Period."

6. "Class Period" means the period from July 12, 2023, through August 9, 2026 [or the date on which the total number of Workweeks is 24,200].

7. "Aggrieved Employees" means all hourly-paid non-exempt employees who worked for Defendant in California at any time during the PAGA Period.

8. "PAGA Period" means the period from July 25, 2024, through August 9, 2026.

9. The Court finds, for settlement purposes only, that the Class meets the requirements for certification under California Code of Civil Procedure § 382 in that: (1) the Class Members are so numerous that joinder is impractical; (2) there are questions of law and fact that are common, or of general interest, to all Class Members, which predominate over individual issues; (3) Plaintiff's claims are typical of the claims of the Class Members; (4) Plaintiff and Class Counsel will fairly and adequately protect the interests of the Class Members; and (5) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

10. The Court appoints as Class Representative, for settlement purposes only, Plaintiff.

The Court further preliminarily approves Plaintiff's ability to request a Class Representative Service Award up to $15,000.00.

11. The Court appoints, for settlement purposes only, Benjamin H. Haber, Talar DerOhannessian, Samantha J. Costa, and Trenten N. Bilodeaux of Wilshire Law Firm, PLC, as Class Counsel. The Court further preliminarily approves Class Counsel's ability to request Class Counsel Fees of up to one third (1/3) of the Gross Settlement Amount (currently estimated to be $195,000.00), and Class Counsel Costs up to $35,000.00 in reimbursement of litigation costs.

12. The Court appoints ILYM Group, Inc. as the Settlement Administrator with reasonable administration costs not to exceed $10,000.00.

13. The Court approves, as to form and content the Class Notice attached hereto as **Exhibit A.** The Court finds on a preliminary basis that plan for distribution of the Class Notice to Class Members satisfies due process, provides the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons entitled thereto.

14. The Parties and the Administrator are ordered to carry out the Settlement according to the terms of the Settlement Agreement.

15. Any Class Member who does not timely and validly request exclusion from the Settlement may object to the Settlement Agreement.

16. The Court orders the following Implementation Schedule:

Event	Timing
Class Data: Last day for Defendant to provide Class Data to the Administrator	15 days after the Court grants Preliminary Approval of the Settlement
Class Notice: Last day for Administrator to mail the Class Notice to Class Members	14 days after receipt of the Class Data

Response Deadline: Last day for Class Members to submit Requests for Exclusion, Objections to the Settlement, and challenges to Workweeks and/or Pay Periods	45 days after Class Notice is mailed out by the Administrator (with an additional 14 days for Class Members whose Class Notice was remailed)
Filing Deadline: Last day to file Motion for Final Approval, Request for Class Counsel Fees and Class Counsel Costs, and Class Representative Service Payment to Plaintiff	16 court days before the Final Approval Hearing
Final Approval Hearing	_____, 2026, at _____ a.m./p.m. in Dept. 19 of the above-referenced Court

17. The Court further ORDERS that, pending further order of this Court, all proceedings in this lawsuit, except those contemplated herein and in the settlement, are stayed.

IT IS SO ORDERED.

DATED: _____

_____
HON. THEODORE C. ZAYNER
JUDGE OF THE SUPERIOR COURT