

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Kristopher N. Tayyeb (SBN 320126)
ktayyeb@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

LETICIA RICO, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

BOYD SPECIALTIES LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No. CIVSB2523082

*[Assigned for All Purposes to the Hon.
Michael A. Dauber, Dept. S35]*

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

Date: January 26, 2027
Time: 8:30 a.m.
Dept.: S35

Complaint Filed: August 11, 2025
Trial Date: None Set

1 The Motion of Plaintiff Leticia Rico (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement came on regularly for hearing before this Court on January 26, 2027, at 8:30
3 a.m. This Court, having considered the proposed Stipulation of Settlement (the “Settlement”)
4 attached to the Declaration of Sean M. Blakely filed concurrently herein; having considered
5 Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, Memorandum of Points
6 and 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 Approval 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 employed by Defendant
16 Boyd Specialties, LLC in California during the period of January 1, 2024
through June 16, 2026 (“Class Period”).

17 2. For purposes of the Settlement, the Court preliminarily designates Plaintiff Leticia
18 Rico as Class Representative, and preliminarily designates Paul K. Haines, Sean M. Blakely, and
19 Kristopher N. Tayyeb of Haines Law Group, APC as Class Counsel.

20 3. The Court designates ILYM Group, Inc. as the third-party Settlement
21 Administrator for mailing notices.

22 4. The Court approves, as to form and content, the Notice of Pendency of Class
23 Action and Proposed Settlement and Notice of Estimated Individual Settlement Award (the
24 “Notice Packet”), attached as Exhibits A and B, respectively, to the Settlement.

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

1 giving notice complies fully with the requirements of California Code of Civil Procedure section
2 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California
3 and United States Constitutions, and other applicable law.

4 6. The Court further approves the procedures for the Settlement Class members to
5 opt out of or object to the Settlement, as set forth in the Class Notice.

6 7. The procedures and requirements for filing objections in connection with the Final
7 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
8 presentation of any Settlement Class member's objection to the Settlement in accordance with the
9 due process rights of all members of the Settlement Class.

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

12 9. The Class Notice shall provide at least sixty (60) calendar days' notice for
13 Settlement Class members to opt out of, or object to, the Settlement.

14 10. The Final Approval Hearing on the question of whether the Settlement should be
15 finally approved as fair, reasonable, and adequate is scheduled in Department S35 of this Court,
16 located at 247 West Third Street, San Bernardino, California 92415 on _____,
17 2027, at _____ a.m. / p.m.

18 11. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
19 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
20 a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's
21 application for reasonable attorneys' fees, reimbursement of litigation expenses, service award to
22 Plaintiff, settlement administration costs, and payment to the Labor & Workforce Development
23 Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act should be
24 granted.

25 12. Counsel for the parties shall file memoranda, declarations, or other statements and
26 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
27 expenses, Plaintiff's service award, payment to the LWDA, and settlement administration costs,
28 prior to the Final Approval 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]:	February 9, 2027
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	February 23, 2027
Deadline for Settlement Class members to request exclusion from, submit a dispute, or object to, the Settlement [60 calendar days after mailing]:	April 26, 2027
Deadline for Plaintiff to file her Motion for Final Approval of Class Action Settlement:	May 26, 2027
Final Approval Hearing:	_____, 2027

14. Pending the Final Approval 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: _____, 2027

Hon. Michael A. Dauber
Judge of the Superior Court