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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SILVIA MARTINEZ, on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

FAMILY HEALTH CARE CENTERS OF
GREATER LOS ANGELES, INC.; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 23STCV04109

CLASS ACTION

*[Assigned for all purposes to Hon.
Samantha Jessner, Dept. SSC-7]*

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

Date: July 15, 2025
Time: 10:00 a.m.
Dept.: SSC-7

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

1 The Motion of Plaintiff Silvia Martinez (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement (the “Motion”) came on regularly for hearing before this Court. This Court,
3 having considered the proposed Settlement Agreement (the “Settlement”) attached to the
4 Declaration of Neil M. Larsen filed concurrently with the Motion; and having considered the
5 Motion, Memorandum of Points and Authorities in support thereof, and supporting declarations
6 filed therewith; and good cause appearing, HEREBY ORDERS AS FOLLOWS:

7 1. The Court GRANTS preliminary approval of the class action settlement as set
8 forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement
9 that ultimately could be granted approval by the Court at a Final Approval Hearing. For purposes
10 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable, and that
11 there is a sufficiently well-defined community of interest among the members of the Settlement
12 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
13 conditional certification of the following Settlement Class: **All individuals who are or were**
14 **previously employed by Defendant Family Health Care Centers of Greater Los Angeles,**
15 **Inc. in California and classified as non-exempt employees at any time from February 24,**
16 **2019 to January 1, 2025 (the “Class Period”).**

17 2. For purposes of the Settlement, the Court preliminarily designates Plaintiff as
18 Class Representative, and preliminarily designates Neil M. Larsen and Jennifer S. Rivera as Class
19 Counsel.

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

22 4. The Court approves the Class Notice attached as Exhibit A to the Settlement.

23 5. The Court finds that the form of notice to the Settlement Class regarding the
24 pendency of the action and of the Settlement, and the methods of giving notice to members of
25 the Settlement Class, constitute the best notice practicable under the circumstances, and
26 constitute valid, due, and sufficient notice to all of the Settlement Class members. The form and
27 method of giving notice complies fully with the requirements of California Code of Civil
28 Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and

1 3.769, the California and United States Constitutions, and other applicable law.

2 6. The Court further approves the procedures to opt-out of or object to the
3 Settlement, as set forth in the Class Notice.

4 7. The procedures and requirements for filing objections in connection with the Final
5 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
6 presentation of any valid objection to the Settlement in accordance with due process.

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

9 9. The Final Approval Hearing on the question of whether the Settlement should be
10 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-7 of this
11 Court, located at 312 North Spring Street, California 90012, on _____, 2025 at
12 _____ a.m./p.m.

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

20 11. Counsel for the parties shall file memoranda, declarations, or other statements and
21 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
22 expenses, Plaintiff's incentive award, payment to the LWDA, and settlement administration
23 costs, prior to the Final Approval Hearing according to the time limits set by the Code of Civil
24 Procedure and the California Rules of Court.

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12. An implementation schedule is below:

Event	Date
Defendants to provide Class Data to the Settlement Administrator no later than [10 days after preliminary approval]:	July 25, 2025
Settlement Administrator to mail Notice Packets to Settlement Class members no later than [14 days after receiving Class Data]:	August 8, 2025
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement [45 calendar days after mailing]:	September 22, 2025
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement [16 court days prior to the Final Approval Hearing]:	
Final Approval Hearing:	_____, 2025

13. 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.

14. 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: _____, 2025

Hon. Samantha Jessner
Judge of the Superior Court