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

FOR THE COUNTY OF LOS ANGELES

ESTHER PRICE, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

HITACHI HIGH-TECH AMERICA, INC., a Delaware corporation; HITACHI HIGH-TECH SCIENCE AMERICA, INC., a California corporation; and DOES 1 through 100,

Defendants.

Case No. 25STCV28131

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

[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: February 24, 2027
Time: 10:00 a.m.
Dept.: SS-7

Complaint Filed: September 23, 2025
Trial Date: None Set

The Motion of Plaintiff Esther Price ("Plaintiff") for Preliminary Approval of Class Action Settlement came on regularly for hearing before this Court on February 24, 2027, at 10:00 a.m. This Court, having considered the proposed Stipulation of Settlement (the "Settlement") attached to the Declaration of Sean M. Blakely filed concurrently herein; having considered Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Memorandum of Points and Authorities in support thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

1. The Court GRANTS preliminary approval of the class action settlement as set forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by the Court at a Final Approval Hearing. For purposes of the Settlement, the Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the Settlement Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following Settlement Class:

> All persons who worked for Defendant Hitachi High-Tech America, Inc. (including, without limitation, as successor-by-merger to Hitachi High-Tech Science America, Inc.) in California as an hourly-paid, non-exempt employee, including those persons placed to work at Defendant Hitachi High-Tech America, Inc. through an outside staffing agency, at any time during the period of September 23, 2021 through August 18, 2026 ("Class Period").

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

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

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

5. The Court finds that the form of notice to the Settlement Class regarding the

pendency of the action and of the Settlement, and the methods of giving notice to members of the Settlement Class, constitute the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all of the Settlement Class members. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

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

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

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

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

10. The Final Approval Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department SS-7 of this Court, located at 312 North Spring Street, Los Angeles, California 90012 on _____, 2027, at _____ a.m. / p.m.

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

12. Counsel for the parties shall file memoranda, declarations, or other statements and

materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's service award, payment to the LWDA, and settlement administration costs, 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]:	March 10, 2027
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business after receiving Class Data]:	March 24, 2027
Deadline for Settlement Class members to request exclusion from, submit a dispute, or object to, the Settlement [60 calendar days after mailing]:	May 24, 2027
Deadline for Plaintiff to file her Motion for Final Approval of Class Action Settlement:	June 24, 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. Samantha P. Jessner
Judge of the Superior Court