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CARMINA VALDEZ

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

CARMINA VALDEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ADVANCED IMAGING CENTER, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 23STCV06358

*[Assigned for all purposes to the Hon. Stuart M.
Rice, Dept. SSC-1]*

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

Date: January 9, 2025
Time: 10:30 a.m.
Dept.: SSC-1

Action Filed: March 22, 2023
Trial Date: None Set

The Motion of Plaintiff Carmina Valdez (“Plaintiff”) for Preliminary Approval of Class Action Settlement will come on regularly for hearing before this Court on January 9, 2025 at 10:30 a.m. The Court, having considered the proposed Amended Class Action Settlement Agreement and Class Notice (the “Settlement”), attached as Exhibit A to the Supplemental Declaration of Milan Moore filed concurrently with the Motion; 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 Fairness 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 current and former non-exempt employees of Defendant Advanced Imaging Center, Inc. in California between March 22, 2019 and November 15, 2024.

3. For purposes of the Settlement, the Court designates named Plaintiff Carmina Valdez as Class Representative, and Scott M. Lidman and Milan Moore of Lidman Law, APC and Paul Haines of Haines Law Group, APC as Class Counsel.

4. The monetary terms of the Settlement are summarized below:

Settlement Sum (“S.S.”):	\$180,000.00
Minus Court-approved attorneys’ fees:	\$60,000.00
Minus Court-approved, verified costs (up to \$20,000.00):	\$20,000.00
Minus Court-approved Class Representative Service Award:	\$7,500.00
Minus Settlement Administration Costs:	\$7,250.00
Minus PAGA payment to the LWDA:	\$7,500.00
Net Settlement Amount (“NSA”):	\$77,750.00

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2 5. The Court designates Phoenix Class Action Administration Solutions as the third-party
3 Settlement Administrator for mailing notices.

4 6. The Court approves, as to form and content, the Notice of Class Action Settlement and
5 Hearing Date for Final Court Approval (“Class Notice”) and is attached to the Settlement as Exhibit A.

6 7. The Court finds that the form of notice to the Settlement Class regarding the pendency of
7 the action and of the Settlement, and the methods of giving notice to members of the Settlement Class,
8 constitutes the best notice practicable under the circumstances, and constitute valid, due, and sufficient
9 notice to all members of the Settlement Class. The form and method of giving notice complies fully
10 with the requirements of California Code of Civil Procedure section 382, California Civil Code section
11 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and
12 other applicable law.

13 8. The Court further approves the procedures for Settlement Class Members to opt out of or
14 object to the Settlement, as set forth in the Class Notice.

15 9. The procedures and requirements for filing objections in connection with the Final
16 Fairness Hearing are intended to ensure the efficient administration of justice and the orderly
17 presentation of any Settlement Class Member’s objection to the Settlement, in accordance with the due
18 process rights of all Settlement Class Members.

19 10. The Court directs the Settlement Administrator to mail the Class Notice to the members
20 of the Settlement Class in accordance with the terms of the Settlement.

21 11. The Class Notice shall provide at least 45 calendar days’ notice for members of the
22 Settlement Class to opt out of, or object to, the Settlement.

23 12. The Final Fairness Hearing on the question of whether the Settlement should be finally
24 approved as fair, reasonable, and adequate is scheduled in Department 1 of this Court, located at 312
25 North Spring Street, Los Angeles, California, 90012 on June 23, 2025 at 10:00 a.m.

26 13. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should
27 be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment
28 granting final approval of the Settlement should be entered; and (c) whether Plaintiff’s application for

reasonable attorneys' fees, reimbursement of litigation expenses, service payment to Plaintiff, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act ("PAGA") should be granted.

14. 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, settlement administration costs, and payment to the LWDA for PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

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15. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to Settlement Administrator	7 calendar days after issuance of the preliminary approval order
Settlement Administrator to mail Notice Packets to Class Members	21 calendar days after issuance of preliminary approval order
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	45 calendar days after mailing of the Notice by the Settlement Administrator
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 court days before FA Hearing
Final Fairness Hearing:	June 23, 2025 at 10:30 a.m.

16. Pending the Final Fairness 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.

17. 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

Honorable Stuart M. Rice
Judge of the Superior Court