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

JAKE STEIN and MARGARET-JESSICA  
DURAN, individually, on behalf of all others  
similarly situated, and on behalf of the State of  
California and other aggrieved persons,

*Plaintiffs,*

v.

ALTERNATIVE THERAPEUTIC SOLUTIONS,  
INC., a California corporation; SOUTH CORD  
MANAGEMENT LLC, a California limited  
liability company; CATALYST MARCH FOR  
ACTION LLC, a California limited liability  
company; 562 DISCOUNT MED, INC., a  
California corporation; and DOES 1 through 10,  
inclusive,

*Defendants.*

Case No. 23STCV07216

*Assigned for all purposes to  
Hon. Carolyn B. Kuhl  
Dept. 12*

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

Date: December 8, 2025  
Time: 10:30 a.m.  
Dept.: 12

**[PROPOSED] ORDER**

Having reviewed Plaintiffs Jake Stein and Margaret-Jessica Duran’s (“Plaintiffs”) Motion for Preliminary Approval of Class Action and PAGA Settlement (“Motion”), the Declaration of Jeffrey C. Bills, the Declaration of Lisa Mullins, the Declarations of Plaintiffs, 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 Plaintiffs and Defendants Alternative Therapeutic Solutions, Inc.; South Cord Management LLC; Catalyst March for Action LLC; 562 Discount Med, Inc.; 316 Florence Holdings, LLC; 1539 Manchester Holdings LLC; F2-Palm Desert, LLC; Ryan Cameron Rayburn Collective Inc.; HNHPC, Inc.; The Pajaro, Inc.; EEL – Pomona LLC; Catalyst – San Diego KM LLC; EEL – El Monte, LLC; Catalyst – Lancaster LLC; 11500 Vermont Holdings LLC; 4158 Pico Holdings LLC; 805 Beach Breaks Inc; Angel Organics Healing Center, LLC; Casey Crow Collective; Catalyst - Antioch LLC; Catalyst - Bellflower LLC; Catalyst - Distro LLC; Catalyst - Hawthorne, LLC; Catalyst - Long Beach V LLC; Catalyst - Lynwood LLC; Catalyst - San Bernardino LLC; Catalyst Hemet LLC; Catalyst - Santa Ana LLC; Central Valley - Sierra Associates; Diamond Alliance, LLC; EEL Oxnard LLC; Nebrina Daly City LLC; Pacific Roots Marina, LLC; Puradora LLC; and RD x Catalyst - Costa Mesa LLC (“Defendants”), attached to the Declaration of Jeffrey C. Bills in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA Settlement as **Exhibit 1**.

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 Defendants have agreed to create a common fund of \$300,000.00 to cover (a) settlement payments to Class Members who do not validly opt out;

1 (b) a \$30,000.00 allocation toward civil penalties under the Private Attorneys General Act, 75%  
2 of which (\$22,500.00) will be paid to the State of California, Labor & Workforce Development  
3 Agency and 25% of which (\$7,500.00) will be paid to eligible Aggrieved Employees; (c) Class  
4 Representatives Service Payments of up to \$10,000.00 to each Plaintiff (\$20,000.00 total); (d)  
5 Class Counsel's attorneys' fees, not to exceed one-third (1/3) of the Gross Settlement Amount  
6 (i.e., \$100,000.00), and up to \$90,000.00 in costs for actual litigation expenses incurred by Class  
7 Counsel; and (e) Settlement Administration Costs of up to \$15,950.00.

8 3. The Court preliminarily finds that the terms of the Settlement appear to be within  
9 the range of possible approval, pursuant to California Code of Civil Procedure § 382 and  
10 applicable law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair  
11 and reasonable to the Class Members when balanced against the probable outcome of further  
12 litigation relating to class certification, liability and damages issues, and potential appeals; (2)  
13 significant informal discovery, investigation, research, and litigation have been conducted such  
14 that counsel for the Parties at this time are able to reasonably evaluate their respective positions;  
15 (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented  
16 by the further prosecution of the litigation; and (4) the proposed Settlement has been reached as  
17 the result of intensive, serious, and non-collusive negotiations between the Parties with the  
18 assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds  
19 that the Settlement Agreement was entered into in good faith.

20 4. A final fairness hearing on the question of whether the proposed Settlement,  
21 attorneys' fees and costs to Class Counsel, payment to the State of California, Labor &  
22 Workforce Development Agency for its share of the settlement of claims for penalties under the  
23 Private Attorneys General Act, and the Class Representatives Service Payments should be  
24 finally approved as fair, reasonable and adequate as to the members of the Class is hereby set  
25 in accordance with the Implementation Schedule set forth below.

26 5. The Court provisionally certifies for settlement purposes only the following class  
27 (the "Class"): means "all persons who worked for Defendants in California as an hourly-paid or  
28 non-exempt employee at any time during the Class Period."

1           6.       “Class Period” means the period from October 7, 2018 through October 4, 2025  
2 or the date of preliminary approval, which ever date is later.

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

11           8.       The Court appoints as Class Representatives, for settlement purposes only,  
12 Plaintiffs. The Court further preliminarily approves Plaintiffs’ ability to request a Class  
13 Representative Service Payment up to \$10,000.00 each.

14           9.       The Court appoints, for settlement purposes only, John G. Yslas, Jeffrey C. Bils,  
15 Aram Boyadjian, Andrew Sandoval, and Lisa B. Iturriaga of Wilshire Law Firm, PLC, as Class  
16 Counsel. The Court further preliminarily approves Class Counsel’s ability to request attorneys’  
17 fees of up to one-third (1/3) of the Gross Settlement Amount (i.e., \$100,000.00), and costs not  
18 to exceed \$90,000.00.

19           10.      The Court appoints ILYM Group, Inc. (“ILYM”) as the Settlement Administrator  
20 with reasonable administration costs estimated not to exceed \$15,950.00.

21           11.      The Court approves, as to form and content the Class Notice, attached to the  
22 Settlement Agreement. The Court finds on a preliminary basis that plan for distribution of the  
23 Notice to Settlement Class Members satisfies due process, provides the best notice practicable  
24 under the circumstances, and shall constitute due and sufficient notice to all persons entitled  
25 thereto.

26           12.      The Parties are ordered to carry out the Settlement according to the terms of the  
27 Settlement Agreement.

28           13.      Any Class Member who does not timely and validly request exclusion from the

Settlement may object to the Settlement Agreement.

14. The Court orders the following implementation schedule:

| EVENT:                                                                                   | DEADLINE:                                                             |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Defendant to provide Class List to the Settlement Administrator                          | 10 days after the Court grants Preliminary Approval of the Settlement |
| Settlement Administrator to mail the Notice Packets                                      | 14 days after receipt of the Class Data                               |
| Class Member Opt Out, Objection and Workweek and/or Pay Period Dispute Deadline          | 45 days after mailing Notice to Class                                 |
| Deadline for Administrator to Submit Declaration in Support of Motion for Final Approval | 14 days before the Deadline to file Motion for Final Approval         |
| Deadline to file Motion for Final Approval                                               | 16 court days before the Final Approval Hearing                       |
| Final Approval Hearing                                                                   | April 15, 2026 at 10:30 a.m.<br>[or _____ at __:___ a.m./p.m.]        |

15. 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.**

DATE:

\_\_\_\_\_  
Hon. Carolyn B. Kuhl  
Los Angeles County Superior Court