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Attorneys for Plaintiff IVONNE SANCHEZ,
on behalf of herself and others similarly situated.

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

IVONNE SANCHEZ, on behalf of herself and
others similarly situated,

Plaintiff,

vs.

INNOVATIVE WAREHOUSING
SOLUTIONS, LLC; and DOES 1 TO 100,
inclusive,

Defendant.

FILED
Superior Court of California
County of Los Angeles
06/04/2025
David W. Stoyko, Executive Officer / Clerk of Court
By: _____ I. Yin Deputy

CASE NO.: 23STCV14380 (Consolidated
with Case No. 23STCV20736)

CLASS AND PAGA ACTION

*[Assigned for all Purposes to the Hon. Carolyn
B. Kuhl; Dept. 12]*

**~~PROPOSED~~ ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Declaration of Eric J. Naessig in
Support Thereof]*

Hearing Information:
Date: June 4, 2025
Time: 10:30 a.m.
Dept.: 12

1 The Motion for Preliminary Approval of a Settlement came before this Court on June 4, 2025,
2 at 10:30 a.m., or as soon thereafter as the matter can be heard in Department 12 of the Los Angeles
3 County Superior Court located at 312 North Spring Street, Los Angeles, CA 90012. The Court,
4 having considered the proposed Class Action and PAGA Settlement Agreement and Class Notice
5 entered into by and between Plaintiff Ivonne Sanchez (“Plaintiff”) and Defendant Innovative
6 Warehousing Solutions, LLC (“Defendant”) attached as **Exhibit 1** to the Declaration of Eric J.
7 Naessig in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and
8 the Exhibits attached thereto (hereafter collectively, the “Settlement” or “Settlement Agreement”);
9 having considered the Motion for Preliminary Approval of Class Action Settlement filed by the
10 parties; having considered the respective points and authorities and declarations submitted by the
11 parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

12 The Court grants preliminary approval of the settlement as set forth in the Settlement and
13 finds the terms to be within the range of reasonableness of a settlement that ultimately could be
14 granted approval by the Court at the Final Fairness Hearing. For purposes of the Settlement only, the
15 Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
16 defined community of interest among the Class in questions of law and fact. Therefore, for settlement
17 purposes only, the Court grants conditional certification of the following “Class” defined as follows:

18 1. Any person employed by Defendant in California and classified as an hourly, non-
19 exempt employee who worked for Defendant during the Class Period. The “Class Period” is the period
20 from June 21, 2019, through January 6, 2025.

21 2. For purposes of the Settlement only, the Court further designates named Plaintiff
22 Ivonne Sanchez as Class Representative, and Joseph Lavi, Esq. and Vincent C. Granberry, Esq.,
23 Cassandra A. Castro, Esq., and Eric Naessig, Esq., of Lavi & Ebrahimian, LLP as Class Counsel.

24 3. The Court appoints ILYM Group, Inc., as the Settlement Administrator.

25 4. A final fairness hearing on the question of whether the proposed Settlement should be
26 finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in
27 Department 12 of this Court, located at 312 North Spring Street, Los Angeles, CA 90012 on
28

Nov. 20, 2025 at 10:30 am.

_____, 2025, at _____ a.m./p.m.

5. At the final fairness hearing, the Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting approval of the Settlement should be entered; and (c) whether Plaintiff's application for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment should be granted.

6. Counsel for the Parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval by no later than 16 court days prior to the final fairness hearing.

7. Class Counsel shall file a motion for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment no later than 16 court days prior to the final fairness hearing.

8. The Court approves, as to form and content, the Class Notice which is appended to the Settlement Agreement.

9. No later than fifteen (15) days following the date the Court enters this order, Defendant shall provide the following information to the Settlement Administrator: Class Member identifying information in Defendant's possession including the Class Member's name, last-known mailing address, Social Security number, number of Class Period Workweeks and PAGA Pay Periods. ("Class Data").

10. Within fourteen (14) calendar days after receiving the Class Data, the Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in the Class Data by first-class U.S. Mail.

11. Class Members shall have sixty (60) calendar days from the date the Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement ("Response Deadline"). Class Members to whom Notice Packets are resent after having been returned undeliverable to the

1 Administrator shall have an additional fourteen (14) calendar days after the Response Deadline has
2 expired.

3 12. The Court finds that the forms of Class Notice to the Class regarding the pendency
4 of the action and of this Settlement, and the methods of giving notice to members of the Settlement
5 Class constitute the best notice practicable under the circumstances and constitute valid, due, and
6 sufficient notice to all members of the Class. They comply fully with the requirements of California
7 Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court
8 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

9 13. The Court further approves the procedures for Class Members to participate in, opt
10 out of, or object to the Settlement, as set forth in the Settlement Agreement and Class Notice.

11 14. Class Members who wish to exclude themselves from (opt-out of) the Class
12 Settlement must send the Administrator, by fax, email, or mail, a signed written Request for
13 Exclusion not later than 60 days after the Administrator mails the Class Notice (plus an additional
14 14 days for Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter
15 from a Class Member or the Class Member's representative that reasonably communicates the Class
16 Member's election to be excluded from the Settlement and includes the Class Member's name,
17 address and email address or telephone number. To be valid, a Request for Exclusion must be timely
18 faxed, emailed, or postmarked by the Response Deadline.

19 15. Participating Class Members may send written objections to the Administrator, by
20 fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire an
21 attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A
22 Participating Class Member who elects to send a written objection to the Administrator must do so
23 not later than 60 days after the Administrator's mailing of the Class Notice (plus an additional 14
24 days for Class Members whose Class Notice was re-mailed).

25 16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings
26 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
27 Order, are stayed.

1 17. Counsel for the parties are hereby authorized to utilize all reasonable procedures in
2 connection with the administration of the Settlement, which are not materially inconsistent with
3 either this Order or the terms of the Settlement.

4 18. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Database	15 days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	60 calendar days after the date of mailing of the Class Notice
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancement.	16 Court days prior to the final fairness hearing
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 Court days prior to the final fairness hearing
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	Approximately 150 days after the Court grants preliminary approval of the Settlement

18 19. The Fairness Hearing and related prior deadlines set forth above may, from time to
19 time and without further notice to the Class (except those who have filed timely and valid objections),
20 be continued or adjourned by Order of the Court. The Settlement Administrator will provide notice
21 to any objecting Class Member if there is a change in the date and/or time of the Final Approval
22 Hearing.

23
24 **IT IS SO ORDERED.**

25
26 Dated: 06/04/2025



A handwritten signature in cursive script, reading "Carolyn B. Kuhl".

Carolyn B. Kuhl / Judge

Hon. Carolyn B. Kuhl
Judge of the Superior Court