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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

ANITA COLQUITT, on behalf of herself and all others similarly situated, and on behalf of the generic public,

Plaintiffs,

v.

L AND R AUTO PARKS, INC., a California Corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No. 22STCV33395

CLASS AND PAGA ACTION

[*Assigned for All Purposes to the Hon. Samantha P. Jessner, Dept. 7*]

[AMENDED PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

[*Filed concurrently with Supplemental Declaration of Daniel F. Gaines]*

Hearing Information:
Date: November 23, 2026
Time: 10:00 a.m.
Dept.: 7

DAVID RAMIREZ, on behalf of himself and others similarly situated,

Plaintiffs,

v.

L AND R AUTO PARKS, INC., and DOES 1 through 100, inclusive,

Defendants.

Case No. 23STCV09020

The Hon. Samantha P. Jessner, Dept. 7

Action Filed: 4/24/23

Trial Date: None Set

ANITA COLQUITT, on behalf of herself and all others similarly situated, and on behalf of the generic public, Plaintiffs, v. L AND R AUTO PARKS, INC., a California Corporation, and DOES 1 through 10, inclusive, Defendants.	Case No. 23STCV00285 The Hon. Samantha P. Jessner, Dept. 7 Action Filed: 01/05/2023 Trial Date: None Set
DAVID RAMIREZ, on behalf of himself and others similarly situated, Plaintiffs, v. L AND R AUTO PARKS, INC., and DOES 1 through 100, inclusive, Defendants.	Case No. 23STCV15194 The Hon. Samantha P. Jessner, Dept. 7 Action Filed: 6/29/2023 Trial Date: None Set
LATONYA CORBIN, on behalf of herself and all "aggrieved employees" pursuant to Labor Code § 2698 *et seq.*, Plaintiff, v. LRW INVESTMENTS LLC, a California limited liability company, LRW CENTURY INVESTMENTS LLC, a California limited liability company, and DOES I through 10, inclusive, Defendants.	Case No. 23STCV20261 The Hon. Samantha P. Jessner, Dept. 7 Action Filed: 08/23/2023 Trial Date: None Set

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The Motion for Preliminary Approval of a Settlement came before this Court on November 23, 2026, at 10:00 a.m., or as soon thereafter as the matter could be heard, in Department 7 of the Los Angeles County Superior Court located at 312 N. Spring St., Los Angeles, California 90012, Plaintiffs ANITA COLQUITT, DAVID RAMIREZ, and LATONYA CORBIN (collectively "Plaintiffs") moved for an order granting preliminary approval of the proposed class action settlement on the terms and conditions set forth in the First Amended Class Action and PAGA Settlement Agreement and Class Notice between Plaintiff and Defendants L AND R AUTO PARKS, INC., LRW INVESTMENTS LLC, and LRW CENTURY INVESTMENTS LLC (collectively "Defendants"), and the Exhibits attached thereto (hereafter collectively, the "Settlement" or "Settlement Agreement"); having considered the Motion for Preliminary Approval of Class Action Settlement filed by the parties; having considered the respective points and authorities and declarations submitted by the parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

The Court grants preliminary approval of the settlement as set forth in the Settlement and finds the terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by the Court at the 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 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following "Class" defined as follows:

All non-exempt employees employed by any Defendant in California during the Class Period.

1. The "Class Period" is the period from October 12, 2018 to the date of preliminary approval (i.e., the date of the entry of this Order).

2. For purposes of settlement, the Court further designates named Plaintiffs ANITA COLQUITT, DAVID RAMIREZ, and LATONYA CORBIN as Class Representative, and Appoint Roman Otkupman and Nidah Farishta of Otkupman Law Firm, A Law Corporation, Joseph Lavi, N. Nick Ebrahimian, Vincent C. Granberry, Jeffrey D. Klein, and Melanie S. Rodriguez of Lavi & Ebrahimian, LLP, and Daniel F. Gaines of Gaines & Gaines, APLC, as Class Counsel.

3. The Court appoints Phoenix Settlement Administrators as the Settlement Administrator.

4. A final fairness hearing on the question of whether the proposed settlement should be finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in Department 7 of this Court, located at 312 N. Spring St., Los Angeles, California 90012, on _____, 2026, 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, Class Counsel Expenses, 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, Class Counsel Expenses, and Class Representative Service Payment by 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 attached to the Settlement as **Exhibit A.**

9. No later than thirty (30) calendar 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, and number of Class Period Workweeks and PAGA Pay Periods ("Class Data").

10. No later than 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 forty-five (45) 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 Administrator shall have an additional fourteen (14) calendar days beyond the Response Deadline.

12. The Court finds that the forms of Class Notice to the Class regarding the pendency of the action and of this 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 members of the Class. They comply 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.

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

14. Class Members who wish to exclude themselves (opt-out of) the Class Settlement must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not later than 45 days after the Administrator mails the Class Notice (plus an additional 14 days for Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class Member or his/her representative that reasonably communicates the Class Member's election to be excluded from the Settlement and includes the Class Member's name, address, and email address or telephone number. To be valid, a Request for Exclusion must be timely faxed, emailed, or postmarked by the Response Deadline.

15. Participating Class Members may send written objections to the Administrator by fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire an attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A Participating Class Member who elects to send a written objection to the Administrator must do so not later than 45 days after the Administrator's mailing of the Class Notice (plus an additional 14 days for Class Members whose Class Notice was re-mailed).

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

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	30 calendar days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 calendar 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	45 calendar days after the date of mailing of the Class Notice (plus an additional 14 days for members whose notice is re-mailed).
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

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

IT IS SO ORDERED.

Dated: _____

_____
Hon. Samantha P. Jessner,
Judge of the Superior Court