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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF ALAMEDA**

TELECIA B. HARRIS and DILLAN
 BURGHART, individually, and on behalf of
 themselves and all other similarly situated
 employees and aggrieved employees pursuant to
 the California Private Attorneys General Act,

Plaintiffs,

vs.

WATERMARK SERVICES, IV, LLC; and
 DOES 1 to 100, inclusive,

Defendants.

Case No.: 23CV035212
 Consolidated Case No.: 23CV040577

CLASS ACTION

*[Assigned for all purposes to:
 Judge: Somnath Raj Chatterjee / Dept. 21]*

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

*[Filed in relation to Notice of Motion and
 Motion for Preliminary Approval of Class
 Action Settlement; Declaration of Alexander J.
 Aroeste in Support; Declaration of Alexandra
 Rose in Support; and Declaration of Telecia B.
 Harris in Support; and Declaration of Dillan
 Burghart in Support filed on September 17,
 2025, and concurrently with the Plaintiffs'
 Supplemental Declaration in Support of Motion
 for Preliminary Approval of Class Action
 Settlement]*

Hearing Information:

Date: January 13, 2025

Time: 2:30 p.m.

Dept.: 21

Reservation Number: 725400861843

FILED
 Superior Court of California
 County of Alameda
 02/05/2026
 Glad Filke, Executive Officer / Clerk of the Court
 By:  Deputy
 B. Mercado

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6 Attorneys for Plaintiff DILLAN BURGHART,
individually, and on behalf of all other similarly situated employees
7 and aggrieved employees pursuant to the California Private Attorneys General Act

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1 The Motion for Preliminary Approval of Class Action Settlement came before this Court on
2 January 13, 2025, at 2:30 p.m., or as soon thereafter as the matter can be heard in Department 21 of
3 the Alameda County Superior Court – Administration Building located at 1221 Oak Street, Oakland
4 CA 94612. The Court, having considered the proposed Class Action and PAGA Settlement
5 Agreement (“Settlement” or “Settlement Agreement”) and Class Notice entered into by and
6 between Plaintiff Telecia B. Harris (“Plaintiff Harris”), Plaintiff Dillan Burghart (“Plaintiff
7 Burghart” or collectively “Plaintiffs”), and Defendant WATERMARK SERVICES, IV, LLC
8 (“Defendant”), attached as **Exhibit 1** to the Declaration of Alexander J. Aroeste in Support of
9 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, and the Exhibits attached
10 thereto; having considered the Motion for Preliminary Approval of Class Action Settlement filed by
11 Plaintiffs; having considered the respective points and authorities and declarations submitted by the
12 parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

20 All persons employed by Defendant in California and classified as an hourly, non-exempt
21 employee who worked for Defendant during the Class Period.

22 1. The “Class Period” is the period from June 1, 2022, through March 31, 2025.
23 For purposes of settlement, the Court further designates named Plaintiff TELECIA B. Harris and
24 Plaintiff DILLAN BURGHART as Class Representatives, and Joseph Lavi, Vincent Granberry, and
25 Alexander J. Aroeste of Lavi & Ebrahimian, LLP as well as Jonathan M. Genish, Karen I. Gold,
26 Marissa A. Mayhood, Noam Reiffman, and Alexandra Rose of Blackstone Law, APC as Class
27 Counsel.

28 2. The Court appoints Simpluris, Inc. as the Administrator.

1 3. A final fairness hearing on the question of whether the proposed Settlement should
2 be finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in
3 Department 21 of the Alameda County Superior Court – Administration Building located at 1221
4 Oak Street, Oakland CA 94612, on _____, at _____ a.m./p.m.

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

10 5. Counsel for the parties shall file memoranda, declarations, or other statements and
11 materials in support of their request for final approval by no later than 16 court days prior the final
12 fairness hearing.

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

16 7. The Court approves, as to form and content, the Class Notice which is attached
17 hereto as **Exhibit 1.**

18 8. No later than thirty (30) calendar days following the date the Court enters this Order,
19 Defendant shall provide the following information to the Administrator: Class Member identifying
20 information in Defendant’s possession including the Class Member’s full name, last-known mailing
21 address, Social Security number, and number of Workweeks and PAGA Pay Periods (“Class Data”).

22 9. No later than fourteen (14) calendar days after receiving the Class Data, the
23 Administrator shall disseminate the Class Notice to all the Class Members identified in the Class
24 Data by first-class U.S. Mail.

25 10. Class Members shall have sixty (60) calendar days from the date the Administrator
26 mails the Class Notice to the Class Members to fax, email, or mail Requests for Exclusion,
27 written objections, and/or challenges to Workweeks and/or PAGA Pay Periods (“Response
28 Deadline”). Class Members to whom Class Notices are resent after having been returned

undeliverable to the Administrator shall have an additional fourteen (14) calendar days beyond the expiration of the Response Deadline.

11. The Court finds that the form of Class Notice to the Class regarding the pendency of the action and of the Settlement, and the methods of giving notice to members of the Class constitute the best notice practicable under the circumstances and constitute valid, due, and sufficient notice to all members of the Class. The Class Notice fully complies 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.

12. 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.

13. 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 the Response Deadline. 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 full 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.

14. 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 the Response Deadline.

15. 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.

1 16. 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.

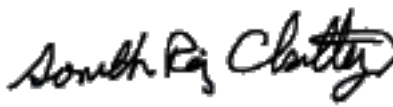
4 17. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Administrator the Class Data	30 calendar days after the Court's entry of this Order
Class Notice: Last day for Administrator to mail the Class Notice to Class Members.	14 calendar days after receipt of the Class Data
Response Deadline: Last day for Class Members to submit Requests for Exclusion, written objections, and/or challenges to Workweeks and/or PAGA Pay Periods.	60 calendar days after the date of mailing of the Class Notice
Extended Response Deadline: Last day for Class Members to submit Requests for Exclusion, written objections, and/or challenges to Workweeks and/or PAGA Pay Periods if they have been resent a Class Notice after the first one was returned as undeliverable.	14 calendar days after the expiration of the Response Deadline.
Last day for Class Counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancements.	16 court days prior to the final fairness hearing
Last day for Plaintiffs 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.	07/14/2026 at 2:30pm

18. 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 submitted timely and valid objections), be continued or adjourned by Order of the Court.

IT IS SO ORDERED.

Dated: 02/05/2026


Hon. Somnath Raj Chatterjee

Judge of the Superior Court
S. Raj Chatterjee / Judge

~~PROPOSED~~ ORDER