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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SAN BERNARDINO**
17

18 LISA CHILDRESS and JUSTIN AARON
19 HEARD, on behalf of themselves and all others
similarly situated,

20
21 Plaintiff,

22
23 vs.

24
25 FORD MOTOR COMPANY; and DOES 1
26 through 100, Inclusive,

27 Defendants.
28

Case No.: CIVSB2324555

CLASS ACTION

*[Assigned for all purposes to the Hon.
Thomas S. Garza. Dept. S27]*

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

Date: April 8, 2023
Time: 8:30 a.m.
Dept.: S27

Action Filed: October 3, 2023
Trial Date: None Set

1 The Motion of Plaintiffs Lisa Childress and Justin Aaron (“Plaintiffs”) for Preliminary
2 Approval of Class Action Settlement (the “Motion”) came on regularly for hearing before this
3 Court on April 8, 2023 at 8:30 a.m. This Court, having considered the proposed Settlement
4 Agreement (the “Settlement”) attached as Exhibit 1 to the Declaration of Neil M. Larsen filed
5 concurrently with the Motion; and having considered the Motion, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause
7 appearing, HEREBY ORDERS AS FOLLOWS:

8 1. The Court GRANTS preliminary approval of the class action settlement as set
9 forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement
10 that ultimately could be granted approval by the Court at a Final Approval Hearing. For purposes
11 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable, and that
12 there is a sufficiently well-defined community of interest among the members of the Settlement
13 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
14 conditional certification of the following Settlement Class:

15 All current and former non-exempt, hourly employees who worked for
16 Defendant in California at any time from July 20, 2019 through October
17 21, 2025 (the “Class Period”).

18 2. For purposes of the Settlement, the Court preliminarily designates Plaintiff
19 Childress and Plaintiff Heard as Class Representatives, and preliminarily designates Neil M.
20 Larsen and Jennifer Rivera of Abramson Labor Group and David Keledjian and David Arakelyan
21 of D.Law, Inc. as Class Counsel.

22 3. The Court designates Simpluris as the third-party Settlement Administrator for
23 mailing notices.

24 4. The Court approves, as to form and content, the Class Notice attached as Exhibit
25 A to the Settlement.

26 5. The Court finds that the form of notice to the Settlement Class regarding the
27 pendency of the action and of the Settlement, and the methods of giving notice to members of
28 the Settlement Class, constitute the best notice practicable under the circumstances, and
constitute valid, due, and sufficient notice to all of the Settlement Class members. The form and

1 method of giving notice complies fully with the requirements of California Code of Civil
2 Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and
3 3.769, the California and United States Constitutions, and other applicable law.

4 6. The Court further approves the procedures to opt-out of or object to the
5 Settlement, as set forth in the Class Notice.

6 7. The procedures and requirements for filing objections in connection with the Final
7 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
8 presentation of any valid objection to the Settlement in accordance with due process.

9 8. The Court directs the Settlement Administrator to mail the Notice Packet to the
10 members of the Settlement Class in accordance with the terms of the Settlement.

11 9. The Final Approval Hearing on the question of whether the Settlement should be
12 finally approved as fair, reasonable, and adequate is scheduled in Department S27 of this Court,
13 located at 247 West 3rd Street, California 92415, on _____, 2026 at _____
14 a.m./p.m.

15 10. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
16 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
17 a judgment granting final approval of the Settlement should be entered; and (c) whether
18 Plaintiffs' application for reasonable attorneys' fees, reimbursement of litigation expenses,
19 service payment to Plaintiffs, settlement administration costs, and payment to the Labor &
20 Workforce Development Agency ("LWDA") for penalties under the Labor Code Private
21 Attorneys General Act ("PAGA") should be granted.

22 11. Counsel for the Parties shall file memoranda, declarations, or other statements and
23 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
24 expenses, Plaintiffs' incentive awards, payment to the LWDA, and settlement administration
25 costs, prior to the Final Approval Hearing according to the time limits set by the Code of Civil
26 Procedure and the California Rules of Court.

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12. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [30 days after preliminary approval]:	May 8, 2026
Settlement Administrator to mail Notice Packets to Settlement Class members no later than [14 days after Defendant provides Class Data]:	May 22, 2026
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement [60 days after mailing]:	July 21, 2026
Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement [no later than 16 court days prior to the Final Approval Hearing]:	_____, 2026
Final Approval Hearing:	_____, 2026

13. Pending the Final Approval 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.

14. 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: _____, 2026

Hon. Thomas S. Garza
Judge of the Superior Court