

1 **JUSTICE FOR WORKERS, P.C.**

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES**

10
11 JUNG HO LEE, an individual and on behalf of
all others similarly situated;

12 Plaintiff,

13 vs.

14
15 VIZIO SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through 50,

16 Defendants.

Case No.: 23STCV24004

[Assigned for All Purposes to:
Hon. David S. Cunningham III, Dept. SS11]

**(PROPOSED) ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

(Filed concurrently with Motion for
Preliminary Approval and Supporting
Declarations)

DATE: May 7, 2026

TIME: 9:00 a.m.

DEPT: 11

Action Filed: October 13, 2023

Trial Date: Not Set

1 The Motion of Plaintiff Jung Ho Lee (“Plaintiff”) for Preliminary Approval of Class Action
2 and PAGA Settlement came on regularly for hearing before this Court. This Court, having
3 considered the proposed Class Action and PAGA Settlement Agreement (the “Agreement” or
4 “Settlement”) attached to the Declaration of William C. Sung filed concurrently herein; having
5 considered Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement,
6 Memorandum of Points and Authorities in support thereof, and supporting declarations filed
7 therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All current and former exempt employees who worked for Defendant VIZIO
16 Services, LLC or its parent and/or holding company in the VIZIO Ad Sales and
17 Business Development Department and any predecessor department in the positions
18 of Account Executive; Account Executive Ad Sales; Senior Account Executive;
19 Account Manager; Senior Account Manager; Senior Manager, Acquisition Sales;
20 Manager, Acquisition Sales; or Senior Analyst, Strategic Account Management
21 within the State of California during the Class Period of October 3, 2019 to October
22 11, 2025.

23 2. For purposes of the Settlement, the Court designates named Plaintiff Daniel R. Perez
24 as Class Representative and William C. Sung and Tiffany L. Luu of Justice for Workers, P.C. as
25 Class Counsel.

26 3. The Court designates Apex Class Action LLC as the third-party Administrator for
27 mailing notices.

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

5. The Court finds that the form of notice to the Class regarding the pendency of the
action and of the Settlement, and the methods of giving notice to Class Members, constitute the best

1 notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all of
2 the Class Members. The form and method of giving notice complies fully with the requirements of
3 California Code of Civil Procedure section 382, California Civil Code section 1781, California
4 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable
5 law.

6 6. The Court further approves the procedures for the Class Members to opt out of or
7 object to the Settlement, as set forth in the Class Notice.

8 7. The procedures and requirements for filing objections in connection with the Final
9 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
10 presentation of any Class Member's objection to the Settlement in accordance with the due process
11 rights of all members of the Class.

12 8. The Court directs the Administrator to mail the Class Notice to Class Members in
13 accordance with the terms of the Settlement.

14 9. The Class Notice shall provide at least forty-five (45) calendar days' notice for Class
15 Members to opt out of, or object to, the Settlement.

16 10. The Final Approval Hearing on the question of whether the Settlement should be
17 finally approved as fair, reasonable, and adequate is scheduled in Department 11 of this Court,
18 located at Spring Street Courthouse, located at 312 North Spring Street, Los Angeles, CA 90012 on
19 _____ at ____ a.m.

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

26 12. Counsel for the parties shall file memoranda, declarations, or other statements and
27 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
28 expenses, Plaintiff's service payment, payment to the LWDA, and settlement administration costs,

no later than 16 court days prior to the Final Approval Hearing.

13. An implementation schedule is below:

Event	Date
Defendant to provide the Administrator with the Class Data	Within 15 calendar days after entry of this Order
Administrator to mail the Class Notice	Within 14 calendar days after receiving the Class Data from Defendant
Response Deadline for Class Members	Within 45 calendar days after the Administrator mails the Class Notice (extended by 14 calendar days for any re-mailed initial Class Notices)
Last Day to File a Motion for Final Approval of Class Action and PAGA Settlement	At least 16 court days before the Final Approval Hearing:
Final Approval Hearing	_____ at ____ a.m.

14. 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.

15. 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. David S. Cunningham III
Judge of the Superior Court