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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MIRANDA MARAVILLA, BETSY
CASTELLANOS, and SARA MORENO as
individuals and on behalf of all others
similarly situated,

Plaintiffs,

vs.

LOUIS VUITTON U.S.
MANUFACTURING, INC., a Delaware
corporation; and DOES 1 through 100,

Defendants.

CASE NO. 23STCV19872

*[Case assigned for all purposes to the Hon.
David S. Cunningham III, Dept. SS-11]*

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

Date: November 25, 2025
Time: 10:00 a.m.
Dept.: SS-11

Action Filed: August 18, 2023
Trial Date: None Set

[PROPOSED] ORDER

The Motion of Plaintiffs Miranda Maravilla, Betsy Castellanos, and Sara Moreno (collectively, “Plaintiffs”) for Preliminary Approval of Class and PAGA Action Settlement came regularly for hearing before this Court on November 25, 2025, at 10:00 a.m. The Court, having considered Plaintiffs’ Motion for Preliminary Approval of Class and PAGA Action Settlement, including the memorandum of points and authorities and declarations in support thereof; having considered the proposed Class Action and PAGA Settlement Agreement and Class Notice (“Settlement Agreement” or “Settlement”) entered into between Plaintiffs and Defendant Louis Vuitton U.S. Manufacturing, Inc. (“Defendant”), attached as Exhibit 1 to the Declaration of Andrew J. Rowbotham filed concurrently; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

1. The Court GRANTS preliminary approval of the class action settlement as set forth in the Settlement Agreement and finds its terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by the Court at a Final Approval hearing.

2. The Court preliminarily approves the terms of the Settlement Agreement and finds that they fall within the range of approval as fair, adequate and reasonable. Based on a review of the papers submitted by Plaintiffs, the Court finds that the Settlement is the result of arms’-length negotiations conducted after Plaintiffs and/or Plaintiffs’ counsel adequately investigated the claims and became familiar with the strengths and weaknesses of the claims. The assistance of an experienced mediator in the settlement process supports the Court's conclusion that the Settlement is non-collusive and reasonable. The Settlement is presumptively valid, subject only to any objections that may be raised pursuant to the terms of the Settlement Agreement.

3. 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 members of the Settlement Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following Settlement Class:

1 All of Defendant's current and former non-exempt employees who worked for
2 Defendant in California at any time between August 18, 2019, and July 1, 2025
(the "Class Period").

3 4. For purposes of the Settlement, the Court designates named Plaintiffs Miranda
4 Maravilla, Betsy Castellanos, and Sara Moreno as the Class Representatives, and designates Paul
5 K. Haines, Fletcher W. Schmidt, Andrew J. Rowbotham, and Susan J. Perez of Haines Law
6 Group, APC, and Orion Robinson of Robinson Di Lando, A Professional Law Corporation, as
7 Class Counsel.

8 5. The Court designates Apex Class Action Administration as the third-party
9 Settlement Administrator for mailing notices.

10 6. The Court approves, as to form and content, the Court Approved Notice of Class
11 Action and PAGA Settlement and Hearing Date for Final Court Approval ("Notice Packet")
12 attached to the Settlement Agreement.

13 7. The Court finds that the form of notice to the Settlement Class regarding the
14 pendency of the action and of the Settlement, and the methods of giving notice to Settlement Class
15 members, constitute the best notice practicable under the circumstances, and constitute valid, due,
16 and sufficient notice to all Settlement Class members. The form and method of giving notice
17 complies fully with the requirements of California Code of Civil Procedure § 382, California
18 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other
19 applicable law.

20 8. The Court further approves the procedures for Settlement Class Members to opt-
21 out of or object to the Settlement, as set forth in the Notice Packet and the Settlement Agreement.

22 9. The procedures and requirements for submitting objections in connection with the
23 Final Approval Hearing are intended to ensure the efficient administration of justice and the
24 orderly presentation of any Settlement Class member's objection to the Settlement, in accordance
25 with the due process rights of all Settlement Class members.

26 10. The Court directs the Settlement Administrator to mail the Notice Packet to the
27 Settlement Class Members in English and Spanish, in accordance with the terms of the Settlement.
28

11. Pursuant to the Settlement Agreement, the Notice Packet shall provide at least 60 calendar days' notice for Settlement Class members to submit disputes, opt-out of, or object to the Settlement.

12. The Final Approval Hearing on the question of whether the Settlement Agreement should be finally approved as fair, reasonable, and adequate is scheduled for May 18, 2026, at 10:00 a.m. in Department SS-11 of this Court, located at 312 N. Spring St., Los Angeles, CA 90012. The Court reserves the right to continue the date of the Final Approval Hearing without further notice to the Settlement Class members. The Court retains jurisdiction to consider all further applications arising out of or in connection with the Settlement Agreement.

13. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement Agreement should be approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs' application for settlement administration costs, payment to the California Labor and Workforce Development Agency ("LWDA") for its 75% share of civil penalties under the Private Attorneys General Act ("PAGA"), Labor Code § 2698 *et seq.*, and Class Counsel's attorneys' fees and costs should be granted.

14. Plaintiffs' Counsel shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement and Plaintiffs' application for settlement administration costs, payment to the LWDA for its share of PAGA penalties, and Class Counsel's attorneys' fees and costs prior to the Final Approval Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

15. An implementation schedule is provided below:

Event	Date
Defendant to provide class contact information to the Settlement Administrator no later than (15 business days after entry of the Preliminary Approval Order, assuming Preliminary Approval is granted on November 25, 2025):	December 17, 2025

Settlement Administrator to mail the Notice Packet to the Settlement Class members no later than (30 calendar days after entry of the Preliminary Approval Order, assuming Preliminary Approval is granted on November 25, 2025):	January 16, 2026
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement (60 days after mailing of the Notice Packet):	March 17, 2026
Deadline for Plaintiffs to file Motion for Final Approval of Class Action Settlement:	April 23, 2026
Final Approval Hearing:	May 18, 2026, at 10:00 a.m.

16. 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.

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.

IT IS SO ORDERED.

Dated: _____

Honorable David S. Cunningham III
Judge of the Superior Court