

EFS-020

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 327206 NAME: Travis J. Maher FIRM NAME: LAWYERS FOR JUSTICE, PC STREET ADDRESS: 450 North Brand Blvd., Suite 900 CITY: Glendale STATE: CA ZIP CODE: 91203 TELEPHONE NO.: 818-265-1020 FAX NO.: 818-265-1021 E-MAIL ADDRESS: travis@calljustice.com ATTORNEY FOR (name): Plaintiffs Araceli Herrera and Loretta Urbina		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 751 W. Santa Ana Blvd. MAILING ADDRESS: 751 W. Santa Ana Blvd. CITY AND ZIP CODE: Santa Ana, 92701 BRANCH NAME: Civil Complex Center		
PLAINTIFF/PETITIONER: Araceli Herrera and Loretta Urbina DEFENDANT/RESPONDENT: Behavioral Systems Southwest Inc. OTHER:		CASE NUMBER: 30-2022-01243365-CU-OE-CXC
		JUDICIAL OFFICER: Hon. Lon F. Hurwitz
PROPOSED ORDER (COVER SHEET)		DEPT: CX105 Reservation: 74586782

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
Plaintiffs Araceli Herrera and Loretta Urbina
2. Title of the proposed order:
[Proposed] Order Granting preliminary Approval of Class and Representative Action Settlement
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Motion for Preliminary Approval of Class Settlement
 - b. Date and time: 8/29/2025 at 10:00 am
 - c. Place:
4. The proposed order was served on the other parties in the case.

Travis J. Maher

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

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CASE NAME:

CASE NUMBER:
30-2022-01243365-CU-OE-CXC**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action**.

a. My residence or business address is (*specify*):

b. My electronic service address is (*specify*):

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):

SEE SEPARATE PROOF OF SERVICE

b. To (*electronic service address of person served*):

c. On (*date*):

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

Ashley Chandler

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

Travis J. Maher (SBN 327206)
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Attorneys for Plaintiffs Araceli Herrera, Loretta Urbina

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Attorneys for Plaintiff Brittany Towns

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ARACELI HERRERA, individually, and on
behalf of other members of the general public
similarly situated; BRITTANY TOWNS,
LORETTA URBINA, individually, and on
behalf of other members other members of the
general public similarly situated and on behalf
of other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

vs.

BEHAVIORAL SYSTEMS SOUTHWEST,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

CASE NO.: 30-2022-01243365-CU-OE- CXC

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

Reservation: 74586782

Date: August 29, 2025

Time: 10:00 a.m.

Dept.: CX-103

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

IT IS HEREBY ORDERED:

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiffs Araceli Herrera, Brittany Towns, and Loretta Urbina as Class Representatives;
3. The Court grants preliminary approval of Otkupman Law Firm, A Law Corporation and Lawyers for Justice, P.C. as Class Counsel;
4. The Court grants preliminary approval of Settlement of claims as set forth in the Settlement Agreement;
5. The Court approves the proposed Class Notice and Exclusion Form;
6. The Court grants preliminary approval of the Total Settlement Amount of Nine Hundred Seventy-Five Thousand Dollars (\$975,000.00);
7. The Court grants preliminary approval of ILYM Group, Inc. as Settlement Administrator and payment of service in an amount up to Twenty Thousand Dollars (\$20,000.00);
8. The Court grants preliminary approval of Class Representative Enhancement Payments to Plaintiffs Araceli Herrera, Brittany Towns, and Loretta Urbina, in an amount up to Twelve Thousand Five Hundred Dollars (\$12,500.00) each;
9. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of Three Hundred Forty-One Thousand Two Hundred Fifty Dollars (\$341,250.00) and costs up to Twenty Thousand Dollars (\$20,000.00);
10. The Court grants preliminary approval of the PAGA Payment in the amount of One Hundred Thousand Dollars (\$100,000.00). Seventy-five percent (75%) of this amount will be paid to the LWDA and twenty-five percent (25%) of this amount will be paid to the Aggrieved Employees on a pro rata basis.

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1 11. The Court grants the schedule for implementation of the terms of the Settlement Agreement
2 and the Court sets a hearing on final approval on _____ at
3 _____ a.m./p.m. in Department _____.

4
5 DATED: _____

HON. JUDGE OF THE SUPERIOR COURT