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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

RUBEN PEREZ, as an individual and on behalf of
all others similarly situated,

Plaintiff,

vs.

GRAIN CRAFT, LLC, a Delaware limited liability
company; and DOES 1 through 100,

Defendants.

Case No. 23STCV24438

*[Case assigned for all purposes to the Hon.
William F. Highberger, Dept. SSC-10]*

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

Date: July 2, 2025
Time: 10:00 a.m.
Dept.: SSC-10

Complaint Filed: October 6, 2023
Trial Date: None Set

1 The Motion of Plaintiff Ruben Perez (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement came on regularly for hearing before this Court on July 2, 2025 at 10:00 a.m.
3 This Court, having considered the proposed Stipulation of Settlement (the “Settlement”) attached
4 to the Declaration of Sean M. Blakely filed concurrently herein; having considered Plaintiff’s
5 Motion for Preliminary Approval of Class Action Settlement, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause
7 appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All current and former non-exempt employees who worked for
16 Defendant Grain Craft, LLC, in California from October 6, 2019, to
17 August 30, 2024 (the “Class Period”).

18 2. For purposes of the Settlement, the Court designates Plaintiff Ruben Perez as Class
19 Representative, and designates Paul K. Haines, Sean M. Blakely, and Joel M. Gordon of Haines
20 Law Group, APC as Class Counsel.

21 3. The Court designates ILYM Group, Inc. as the third-party Settlement
22 Administrator for mailing notices.

23 4. The Court approves, as to form and content, the Class Notice and Notice of
24 Estimated Settlement Payment (collectively, the “Notice Packet”), attached as Exhibits 1, and 2,
25 respectively, 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 the
28 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 method of

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

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

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

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

12 9. The Class Notice shall provide at least sixty (60) calendar days' notice for
13 Settlement Class members to opt out of, or object to, the Settlement.

14 10. The Final Approval Hearing on the question of whether the Settlement should be
15 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-10 of this
16 Court, located at 312 N. Spring Street, Los Angeles, California 90012 on
17 _____, 2025, at _____ a.m. / p.m.

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

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

13. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [10 business days after preliminary approval]:	July 17, 2025
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	July 31, 2025
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement [60 calendar days after mailing]:	September 29, 2025
Deadline for Plaintiff to file his Motion for Final Approval of Class Action Settlement:	October 29, 2025
Final Approval Hearing:	_____, 2025

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: _____, 2025

Hon. William F. Highberger
Judge of the Superior Court