

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Liam A. Hall (SBN 358204)
llhall@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

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

AUDIE MUNOZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

RALPHS GROCERY COMPANY, an Ohio
Corporation; and DOES 1 through 100,

Defendants.

Case No. 23STCV28212

*[Assigned to the Hon. Laura A. Seigle
Dept. 17]*

**PROOF OF SERVICE OF PROPOSED
SETTLEMENT TO LABOR AND
WORKFORCE DEVELOPMENT
AGENCY**

Complaint filed: November 16, 2023
Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Los Angeles County Superior Court Case No. 23STCV28212

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is ☒ 2155 Campus Drive, Suite 180, El Segundo, California 90245.

STIPULATION OF SETTLEMENT

**DECLARATION OF PAUL K. HAINES IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

**DECLARATION OF SEAN M. BLAKELY IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

**DECLARATION OF PLAINTIFF AUDIE MUNOZ IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

DECLARATION OF ANTHONY ROGERS OF ILYM GROUP, INC.

[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

on the interested party(ies) in this action as follows:

[X] (VIA ELECTRONIC SUBMISSION) I submitted a true and correct copy of the document(s) described above to the LWDA's website in accordance with the policies and procedures of the LWDA for submission of such documents.

California Labor & Workforce Development Agency (LWDA)
800 Capitol Mall, MIC-55
Sacramento, CA 95814
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

///

///

///

1 [X] (STATE) I declare under penalty of perjury under the laws of the State of California that
2 the above is true and correct.

3 Executed on May 15, 2026, at El Segundo, California.

4 *Rachel Sanchez*
5 Rachel Sanchez
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE