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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 for all purposes to the Hon.
Laura A. Seigle, Dept. SSC-17]*

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

Date: June 11, 2026

Time: 9:00 a.m.

Dept.: SSC-17

Action Filed: November 16, 2023

Trial Date: None Set

1 The Motion of Plaintiff Audie Munoz (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement came on regularly for hearing before this Court, on June 11, 2026, at 9:00 a.m.
3 This Court, having considered the proposed Class Action and PAGA Settlement Agreement (the
4 “Settlement”) attached to the Declaration of Sean M. Blakely filed concurrently herein; having
5 considered Plaintiff’s Motion for Preliminary Approval of Class Action 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
9 forth in the Settlement and finds its terms to be within the range of reasonableness of a settlement
10 that ultimately could be granted approval by the Court at a Final Fairness Hearing. For purposes
11 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable and that
12 there is a sufficiently well-defined community of interest among the members of the Settlement
13 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
14 conditional certification of the following Settlement Class:

15 All current and former non-exempt distribution center associates who were
16 employed by Defendant Ralphs Grocery Company in California at any time
17 from November 16, 2019 to December 10, 2022 (the “Class Period”).

18 2. For purposes of the Settlement, the Court designates Plaintiff as Class
19 Representative and designates Paul K. Haines and Sean M. Blakely of Haines Law Group, APC
20 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 attached as Exhibit
24 A to the Settlement.

25 5. The Court finds that the form of notice to the Settlement Class regarding the
26 pendency of the action and of the Settlement, and the methods of giving notice to members of the
27 Settlement Class, constitute the best notice practicable under the circumstances, and constitute
28 valid, due, and sufficient notice to all of the Class Members. The form and method of giving

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

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

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

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

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

10. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department SSC-17 of this Court, located at 312 North Spring Street, Los Angeles, California 90012, on _____, 2026 at _____.

11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be finally 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 Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, service payment to Plaintiff, and settlement administration costs should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's service payment, and settlement administration costs, prior to the Final Fairness 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 [20 business days after preliminary approval]:	July 10, 2026
Settlement Administrator to mail the Class Notice to Class Members no later than [10 business days after receiving Class Data]:	July 24, 2026
Deadline for Class Members to request exclusion from, submit a workweek dispute, or object to, the Settlement [45 calendar days after mailing]:	September 8, 2026
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	October 7, 2026
Final Fairness Hearing:	_____

14. Pending the Final Fairness 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. Laura A. Seigle
Judge of the Superior Court