

SULLIVAN EMPLOYMENT LAW PC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ELLIOTT MORALES, and individual, on
behalf of himself and all others similarly
situated;

Plaintiff,

vs.

LOCKWOOD INDUSTRIES LLC
DBA FRALOCK, a California Limited
Liability Company, FRALOCK LLC, a
Delaware Limited Liability Company, and
DOES 1 through 50, inclusive;

Defendants.

CASE NO. 23STCV27759

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

Hearing Date: June 5, 2025

Time: 10:30 a.m.

Dept.: 1

Judge: Hon. Stuart M. Rice

1 **TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:**

2 The Motion for Preliminary Approval of a Class Action Settlement came before this Court, on
3 June 5, 2025, at 10:30 a.m., the Honorable Stuart M. Rice presiding. The Court having considered the
4 papers submitted in support of the application of the parties, HEREBY ORDERS THE FOLLOWING:

5 1. The Court grants preliminary approval of the Settlement and the Settlement Class based
6 upon the terms set forth in the Joint Stipulation of Settlement and Release (“Settlement Agreement”),
7 filed herewith. All terms used herein shall have the same meaning as defined in the Settlement
8 Agreement. The settlement set forth in the Settlement Agreement (“Settlement”) appears to be fair,
9 adequate, reasonable, and in the best interests of the absent class members.

10 2. The Settlement falls within the range of reasonableness and appears to be
11 presumptively valid, subject only to any objections that may be raised at the final fairness hearing and
12 final approval by this Court.

13 3. A final fairness hearing on the question of whether the proposed Settlement, attorneys’
14 fees and costs to Class Counsel, and the Class Representatives’ Enhancement Award should be finally
15 approved as fair, reasonable and adequate as to the members of the Class is scheduled in Department 1
16 on the date and time set forth in the Implementation Schedule in Paragraph 9 below. Plaintiff suggests
17 the week of November 3, 2025, for Final Approval.

18 4. The Settlement Agreement is Attached to the Declaration of Martin Sullivan As
19 **Exhibit A**. This Court approves, as to form and content, the Notice of Proposed Class Action
20 Settlement, including estimated settlement share (“Class Notice”), attached to the Settlement
21 Agreement, as **Attachment 1**. This Court also approves, as to form and content, the Request for
22 Exclusion [from the Proposed Class Action Settlement] (“Request for Exclusion”), attached to the
23 Settlement Agreement, as **Attachment 2**. This Court also approves, as to form and content, the
24 Objection Form (“Objection Form”), attached to the Settlement Agreement, as **Attachment 3**. The
25 Court approves the procedure for Class Members to participate in, to opt out of, and to object to, the
26 Settlement as set forth in the Settlement Agreement.

27 5. The Court directs the mailing of the Class Notice, Request for Exclusion, and Objection
28 Form by first class mail to the Class Members in accordance with the Implementation Schedule set

1 forth below. The Court finds the dates selected for the mailing and distribution of the Notice, as set
2 forth in the Implementation Schedule, meet the requirements of due process and provide the best
3 notice practicable under the circumstances and shall constitute due and sufficient notice to all persons
4 entitled thereto.

5 6. It is ordered that the Settlement Class is preliminarily certified for settlement purposes
6 only.

7 7. The Court confirms Plaintiff Elliott Morales as Class Representative and Martin
8 Sullivan of Sullivan Employment Law PC as Class Counsel.

9 8. The Court approves and confirms ILYM Group, Inc. as the Settlement Administrator.

10 9. The Court orders the following **Implementation Schedule** for further proceedings:

11 a.	Deadline for Defendant to Submit Class Member Information to Settlement Administrator	[Within 20 business days after the Preliminary Approval Date, S.A. ¶ 3.6.2]
12 b.	Deadline for Settlement Administrator to Mail Notice and Claim Form to Class Members	[Within 10 calendar days after receiving Class Information, S.A. ¶ 3.6.4]
13 c.	Deadline for Class Members to Postmark any Disputes to Settlement	[45 calendar days after mailing of the Notice and Claim Form, S.A. ¶ 1.39]
14 d.	Deadline for Class Members to Postmark Requests for Exclusion	[45 calendar days after mailing of the Notice and Claim Form, S.A. ¶ 1.39]]
15 e	Deadline for Class Members to Postmark any Objections to Settlement	[45 calendar days after mailing of the Notice and Claim Form, S.A. ¶¶ 1.39, 3.9]]
16 f.	Deadline for Settlement Administrator to provide Class Counsel with Declaration of Due Diligence and Proof of Mailing	[At least 30 calendar days prior to the Final Approval Hearing, S.A. ¶ 3.19]
17 g.	Deadline for Class Counsel to file Motion for Final Approval of Settlement, including Request for Attorneys' Fees, Costs, and Enhancement Award	[16 Court days before Final Approval Hearing]
18 i.	Final Fairness Hearing and Final Approval	_____, 2025

j.	Deadline for Settlement Administrator to mail the Settlement Awards and the Enhancement Award, and to wire transfer the Attorneys' Fees and Costs (if Settlement is Effective)	[No later than 10 business days after the Settlement is fully funded, S.A. ¶¶ 3.13]
k.	Settlement Administrator to Provide Proof of Payment of Settlement Awards, Enhancement Award, Attorneys' Fees and Costs (if Settlement is Effective)	[No later than 120 calendar days after Order granting final approval, S.A. ¶ 3.21]

IT IS SO ORDERED.

DATED: _____

Hon. Stuart M. Rice
Judge of the Superior Court,
Los Angeles

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