

1 Neil M. Larsen, Esq. (SBN 276490)
neil@abramsonlabor.com
2 Jennifer Rivera, Esq. (SBN 353268)
jennifer.r@abramsonlabor.com
3 **ABRAMSON LABOR GROUP**
1700 W. Burbank Blvd.
4 Burbank, California 91506
Tel: (213) 493-6300
5 Fax: (213) 723-2522

6
Manny Starr (319778)
7 manny@frontierlawcenter.com
Daniel Ginzburg (327338)
8 dan@frontierlawcenter.com
FRONTIER LAW CENTER
9 23901 Calabasas Road, Suite 1084
Calabasas, CA 91302
10 Telephone: (818) 914-3433
Facsimile: (818) 914-3433

11 *Attorneys for Plaintiffs*

12
13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF VENTURA**
15

16 NOEL OCHOA and VERONICA LUNA, on
17 behalf of themselves and all others similarly
situated,

18
19 Plaintiffs,

20
21 vs.

22
23 C&W FACILITY SERVICES INC.; and DOES
24 1 through 100, inclusive,

25 Defendants.
26

Case No.: 2023CUOE015787

CLASS ACTION

*[Assigned for all purposes to Hon.
Charmaine H. Buehner, Dept. J4]*

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

Date: November 5, 2025

Time: 8:30 a.m.

Dept.: J4

Action Filed: October 25, 2023

Trial Date: None Set

1 The Motion of Plaintiffs Noel Ochoa and Veronica Luna (“Plaintiffs”) for Preliminary
2 Approval of Class Action Settlement (the “Motion”) came on regularly for hearing before this
3 Court on November 5, 2025 at 8:30 a.m. This Court, having considered the proposed Settlement
4 Agreement (the “Settlement”) attached as Exhibit 1 to the Declaration of Neil M. Larsen filed
5 concurrently with the Motion; and having considered the Motion, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause
7 appearing, HEREBY ORDERS AS FOLLOWS:

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 Approval 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 non-exempt employees and non-unionized employees of Defendant
16 C&W Facility Services, Inc. who worked in California from March 30,
17 2019 to May 15, 2025, and whose claims were not released by the
18 settlement in *Ruth Ramirez, et al. v. C&W Facility Servs., Inc., et al.*,
Central District of California Case No. 2:20-cv-11319-JVS(PVCx) (the
“Class Period”).

19 2. For purposes of the Settlement, the Court preliminarily designates Plaintiffs Noel
20 Ochoa and Veronica Luna as Class Representatives, and preliminarily designates Abramson
21 Labor Group and Frontier Law Center as Class Counsel.

22 3. The Court preliminarily designates Phoenix Settlement Administrators as the
23 third-party Settlement Administrator for mailing notices.

24 4. The Court approves the Class Notice attached as Exhibit 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 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 to opt-out of or object to the
5 Settlement, as set forth in the Class Notice.

6 7. The procedures and requirements for filing objections in connection with the Final
7 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
8 presentation of any valid objection to the Settlement in accordance with due process.

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

11 9. The Final Approval Hearing on the question of whether the Settlement should be
12 finally approved as fair, reasonable, and adequate is scheduled in Department J4 of this Court,
13 located at 4353 E. Vineyard Avenue, Oxnard, CA 93036, on _____, 2025 at
14 _____ a.m./p.m.

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

22 11. Counsel for the Parties shall file memoranda, declarations, or other statements and
23 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
24 expenses, Plaintiff's incentive award, payment to the LWDA, and settlement administration costs,
25 prior to the Final Approval Hearing according to the time limits set by the Code of Civil Procedure
26 and the California Rules of Court.

27 ///

28 ///

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

12. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [21 calendar days after preliminary approval]:	November 26, 2025
Settlement Administrator to mail Notice Packets to Settlement Class members no later than [21 calendar days after Defendant provide Class Data]:	December 17, 2025
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement [60 calendar days after mailing]:	February 15, 2026
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	March 17, 2026
Final Approval Hearing:	_____, 2026 at _____

13. 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.

14. 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. Charmaine H. Buehner
Judge of the Superior Court