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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

GUADALUPE SANCHEZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

B & J, LLC, a California Limited Liability
Company; and DOES 1 through 100,

Defendants.

CASE NO. CVRI2400579

*[Case assigned for all purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**[PROPOSED] JUDGMENT AND ORDER
GRANTING PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: October 29, 2025

Time: 8:30 a.m.

Dept.: 1

Complaint Filed: February 2, 2024

Trial Date: None Set

1 completed in accordance with the Settlement and the Court's Preliminary Approval Order. The
2 Court finds that the notice was the best notice practicable under the circumstances. The Class
3 Notice provided due and adequate notice of the proceedings and matters set forth therein,
4 informed Settlement Class Members of their rights, and fully satisfied California Rules of Court,
5 rules 3.766 and 3.769, and due process.

6 5. The Court finds that no Settlement Class Members objected to the Settlement; that
7 one Settlement Class Member, Jaden Vitela, opted out; and that the 99.92% participation rate
8 supports final approval of the Settlement.

9 6. The Court hereby approves the terms of the Settlement as fair, reasonable, and
10 adequate, and directs the parties to effectuate the Settlement in accordance with its terms.

11 7. For purposes of settlement only, the Court finds that: (a) the members of the
12 Settlement Class are ascertainable and so numerous that joinder of all members is impracticable;
13 (b) there are questions of law and fact common to the Settlement Class, and a well-defined
14 community of interest exists among the members with respect to the subject matter of the
15 litigation; (c) the claims of the Class Representative are typical of the claims of the Settlement
16 Class Members; (d) the Class Representative has fairly and adequately protected the interests of
17 the Settlement Class; (e) a class action is superior to other available methods for the fair and
18 efficient adjudication of this controversy; and (f) Class Counsel are experienced and qualified to
19 represent the Class Representative and the Settlement Class.

20 8. The Court finds that in light of the absence of objections to the Settlement, this
21 Order is deemed final as of the date of its entry.

22 9. The Court finds that the Individual Settlement Payments, as provided in the
23 Settlement, are fair, reasonable, and adequate and orders the Settlement Administrator to
24 distribute the payments in accordance with the terms of the Settlement.

25 10. The Court orders Defendants B & J, LLC, Bernard Karcher Investments, Inc., and
26 Star Goals, LLC to deposit the Maximum Settlement Amount of \$1,125,000.00 with the
27 Settlement Administrator in accordance with the procedures set forth in the Settlement.
28

1 11. The Court finds that an Enhancement Payment in the amount of \$7,500.00 to the
2 named Plaintiff is appropriate in light of Plaintiff’s risks undertaken and service to the Settlement
3 Class. The Court finds that this payment is fair, reasonable, and adequate and orders the
4 Settlement Administrator to make this payment in accordance with the terms of the Settlement.

5 12. The Court finds that attorneys’ fees in the amount of \$375,000.00 and litigation
6 costs of \$24,028.08 for Class Counsel are fair, reasonable, and adequate in light of the common
7 fund created by the Settlement and orders the Settlement Administrator to distribute these
8 payments to Class Counsel in accordance with the terms of the Settlement. Of the total fees
9 awarded, Haines Law Group, APC will be paid \$300,000.00 in attorneys’ fees and \$24,028.08 in
10 litigation costs, for a total of \$324,028.08, and Law Office of Joseph Richards, P.C. will be paid
11 \$75,000.00 in attorneys’ fees.

12 13. The Court orders the Settlement Administrator to be paid \$12,000.00 from the
13 Maximum Settlement Amount in accordance with the terms of the Settlement for all work
14 performed and to be performed until the completion of this matter, and finds that sum appropriate.

15 14. The Court finds that the amount designated for PAGA civil penalties, \$100,000.00,
16 with 75% (\$75,000.00) allocated to the California Labor and Workforce Development Agency
17 (“LWDA”) and 25% (\$25,000.00) allocated to PAGA Aggrieved Employees, is fair, reasonable,
18 and adequate, and orders the Settlement Administrator to distribute these payments in accordance
19 with the terms of the Settlement.

20 15. The Court orders that all settlement checks will be negotiable for 180 calendar
21 days from the date of mailing, and any checks remaining uncashed after this period will be
22 redistributed equally to those individuals who cashed their settlement checks before the check-
23 cashing deadline. The Court further orders that the envelope transmitting a settlement check will
24 bear the notation: “YOUR CLASS ACTION SETTLEMENT CHECK IS ENCLOSED.”

25 16. The Settlement Administrator will mail a reminder postcard to any Settlement
26 Class Member whose settlement check has not been negotiated within 60 days of issuance. For
27 any Settlement Class Member who is a current employee of Defendants, if a distribution is
28 returned as undeliverable and the Settlement Administrator cannot locate a valid mailing address,

1 the Administrator will coordinate with Defendants to deliver the distribution at the employee's
2 worksite.

3 17. Upon entry of Final Judgment and Defendants' complete funding of the Maximum
4 Settlement Amount, Plaintiff and every member of the Settlement Class (except Jaden Vitela,
5 who opted out) will release and discharge Defendants, together with their officers, directors,
6 employees and agents ("Released Parties") from all claims stated in the operative complaint in
7 the lawsuit titled *Guadalupe Sanchez v. B & J, LLC, et al.*, Riverside County Superior Court Case
8 No. CVRI2400579 (the "Action"), and those based upon the facts alleged in the operative
9 complaint (collectively the "Released Claims"). The period of the Released Claims shall mirror
10 the Class Period.

11 18. In addition, Plaintiff and the State of California, release all claims for statutory
12 penalties under PAGA (Labor Code § 2698 *et seq.*) that could have been sought by the Labor
13 Commissioner for the PAGA violations identified in Plaintiff's letters to the LWDA dated
14 February 2, 2024, and April 11, 2025 that arose between February 1, 2023 and March 24, 2025
15 (the "PAGA Period"). Plaintiff does not release any PAGA Aggrieved Employee's claim for
16 wages or damages. The period of the release applicable to PAGA claims shall mirror the PAGA
17 Period.

18 19. This document shall constitute a final judgment pursuant to California Rule of
19 Court 3.769(h), which provides: "If the court approves the settlement agreement after the final
20 approval hearing, the court must make and enter judgment. The judgment must include a provision
21 for the retention of the court's jurisdiction over the parties to enforce the terms of the judgment.
22 The court may not enter an order dismissing the action at the same time as, or after, entry of
23 judgment." The Court shall retain jurisdiction over the parties to enforce the terms of the
24 Settlement, the Final Approval Order, and this Judgment.

25 20. The Court orders the Settlement Administrator to provide notice of entry of this
26 Judgment to the Settlement Class Members by posting a copy of the Judgment and Final Approval
27 Order on the settlement website and including the website URL on settlement checks.
28

21. Plaintiff shall file a Final Accounting Report on or before July 10, 2026. A Final Accounting Hearing is set for July 24, 2026.

IT IS SO ORDERED.

Dated: _____, 2025

Honorable Harold W. Hopp
Judge of the Superior Court