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FILED
Superior Court of California
County of Los Angeles
09/17/2025
David W. Slayton, Executive Officer / Clerk of Court
By: N. Navarro Deputy

Attorneys for Plaintiff MICHAEL SCHREINER,
on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-SPRING STREET COURTHOUSE

MICHAEL SCHREINER, on behalf of
himself and others similarly situated,

Plaintiff,

vs.

iLEAD CALIFORNIA CHARTERS 1; and
DOES 1 to 100, inclusive,

Defendants.

Case No.: 24STCV07819
[Related to Case No.: 24STCV13873]

CLASS ACTION

*[Assigned for all Purposes to the Honorable
Laura A. Seigle, Dept. 17]*

**~~[PROPOSED]~~ ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Declarations in Support Thereof]*

Hearing Information:
Date: September 17, 2025
Time: 9:00 a.m.
Dept.: 17

The Motion for Preliminary Approval of a Settlement came before this Court on that on
September 17, 2025 at 9:00 a.m., or as soon thereafter as the matter can be heard in Department

1 17of the Los Angeles County Superior Court – Spring Street Courthouse located at 312 N Spring
2 Street, Los Angeles, CA 90012. The Court, having considered the proposed Class Action and
3 PAGA Settlement Agreement (“Settlement” or “Settlement Agreement”) and Class Notice entered
4 into by and between Plaintiff MICHAEL SCHREINER (“Plaintiff”) and Defendant iLEAD
5 CALIFORNIA CHARTERS 1. (“Defendant”) attached as **Exhibit 1** to the Declaration of Joanna
6 Meneses in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and
7 the Exhibits attached thereto (hereafter collectively, the “Settlement” or “Settlement Agreement”);
8 having considered the Motion for Preliminary Approval of Class Action Settlement filed by the
9 parties; having considered the respective points and authorities and declarations submitted by the
10 parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

11 The Court grants preliminary approval of the settlement as set forth in the Settlement and
12 finds the terms to be within the range of reasonableness of a settlement that ultimately could be
13 granted approval by the Court at the Final Fairness Hearing. For purposes of the Settlement, the
14 Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
15 defined community of interest among the Class in questions of law and fact. Therefore, for
16 settlement purposes only, the Court grants conditional certification of the following “Class” defined
17 as follows:

18 All current and former hourly, non-exempt employees of Defendant who worked for
19 Defendant iLEAD CALIFORNIA CHARTERS 1 (“Defendant”) in the State of California at any
20 time during the Class Period.

21 1. The “Class Period” is the period from March 27, 2020 to June 25, 2025 or
22 preliminary approval of the settlement, whichever is sooner.

23 2. For purposes of settlement, the Court further designates named Plaintiff Michael
24 Schreiner Class Representative, and Joseph Lavi, Esq., Vincent C. Granberry, Esq., Malcolm E.
25 Clayton, Esq., Joanna E. Meneses, Esq. of Lavi & Ebrahimian, LLP as Class Counsel;

26 3. The Court appoints ILYM Group as the Settlement Administrator.

27 4. A final fairness hearing on the question of whether the proposed settlement should
28 be finally approved as fair, reasonable and adequate as to the members of the Class is scheduled in

1 Department 17 of the Los Angeles County Superior Court-Spring Street Courthouse located at 312
2 N Spring Street, Los Angeles, CA 90012., on March 16, 2026, ~~2025~~, at 9:00 a.m./p.m.

3 5. At the final fairness hearing, the Court will consider: (a) whether the settlement
4 should be approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting
5 approval of the settlement should be entered; and (c) whether Plaintiff's application for an award of
6 Class Counsel Fees, Class Counsel Expenses, and Class Representative Service Payment should be
7 granted.

8 6. Counsel for the parties shall file memoranda, declarations, or other statements and
9 materials in support of their request for final approval by no later than 16 court days prior the final
10 fairness hearing.

11 7. Class Counsel shall file a motion for an award of Class Counsel Fees Payment,
12 Class Counsel Litigation Expenses Payment, and Class Representative Service Payment by no later
13 than 16 court days prior to the final fairness hearing.

14 8. The Court approves, as to form and content, the Class Notice which is attached to
15 the Settlement as **Exhibit 1.**

16 9. No later than fifteen (15) calendar days following the date the Court enters this
17 order, Defendant shall provide the following information to the Settlement Administrator: Class
18 Member identifying information in Defendant's possession including the Class Member's name,
19 last-known mailing address, Social Security number, and number of Class Period Workweeks and
20 PAGA Pay Periods ("Class Data").

21 10. No later than fourteen (14) calendar days after receiving the Class Data, the
22 Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in
23 the Class Data by first-class U.S. Mail.

24 11. Class Members shall have forty-five (45) calendar days from the date the
25 Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for
26 Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement ("Response
27 Deadline"). Class Members to whom Notice Packets are resent after having been returned
28

undeliverable to the Administrator shall have an additional fourteen (14) calendar days beyond the Response Deadline.

12. The Court finds that the forms of Class Notice to the Class regarding the pendency of the action and of this settlement, and the methods of giving notice to members of the Class constitute the best notice practicable under the circumstances and constitute valid, due, and sufficient notice to all members of the Class. They comply 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.

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

14. Class Members who wish to exclude themselves (opt-out of) the Class Settlement must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not later than 45 days after the Administrator mails the Class Notice (plus an additional 14 days for Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class Member or his/her representative that reasonably communicates the Class Member's election to be excluded from the Settlement and includes the Class Member's name, address and email address or telephone number. To be valid, a Request for Exclusion must be timely faxed, emailed, or postmarked by the Response Deadline.

15. Participating Class Members may send written objections to the Administrator, by fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire an attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A Participating Class Member who elects to send a written objection to the Administrator must do so not later than 45 days after the Administrator's mailing of the Class Notice (plus an additional 14 days for Class Members whose Class Notice was re-mailed).

16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this Order, are stayed.

17. 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.

18. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Database	15 calendar days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 calendar days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	45 calendar days after the date of mailing of the Class Notice
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancement.	16 court days prior to the final fairness hearing February 20, 2026
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 court days prior to the final fairness hearing February 20, 2026
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	March 16, 2026 at 9 a.m.

19. The Fairness Hearing and related prior deadlines set forth above may, from time to time and without further notice to the Class (except those who have filed timely and valid objections), be continued or adjourned by Order of the Court.

IT IS SO ORDERED.

Dated: 09/17/2025



Laura Seigle
Hon. Laura Seigle,
Judge of the Superior Court
Laura A. Seigle / Judge