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Attorney for Plaintiff Roque Zarate Jr., individually and on
behalf of all similarly situated individuals and all “aggrieved
employees” pursuant to Labor Code

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

ROQUE ZARATE JR., individually and
on behalf of all similarly situated
individuals and all “aggrieved employees”
pursuant to Labor Code § 2698 et seq.,

Plaintiff,

v.

BILLY CHARLES CRAWFORD AND
CODY ALAN CRAWFORD, individuals
doing business as CRAWFORD
ASSOCIATES, and DOES 1 through 50,
inclusive,

Defendants.

CASE NO: CVRI2403196

Assigned to the Hon. Harold W. Hopp, Dept. 1

CLASS ACTION

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

Date: April 24, 2025

Time: 8:30 a.m.

Dept.: 1

RESERVATION ID: 693136276940

Complaint Filed: June 10, 2024

1 The unopposed motion of proposed Plaintiff Roque Zarate Jr's ("Plaintiff") for Preliminary
2 Approval of Class Action Settlement came on for hearing before this Court in Department 1, Judge
3 Harold W. Hopp presiding, on April 24, 2025 at 8:30 a.m. The Court, having considered the papers
4 submitted in support of the motion and having heard oral argument of the parties, **HEREBY**
5 **ORDERS THE FOLLOWING:**

6 1. The Court grants preliminary approval of the settlement based upon the terms set
7 forth in the proposed Settlement Agreement and Release of Claims (the "Settlement") filed with
8 the Court. The settlement appears to be fair, adequate, and reasonable to the Class;

9 2. The Court finds that the settlement falls within the range of reasonableness and
10 appears to be presumptively valid, subject only to any objections that may be raised at the final
11 hearing;

12 3. The Court approves, as to form and content, the Notice of Pendency of Proposed
13 Class Action Settlement and Final Hearing ("Notice"), attached hereto as Exhibit 1, the Request
14 for Exclusion from Class "Opt Out" Form ("Exclusion Form"), attached hereto as Exhibit 2, and
15 the Objection to Settlement form ("Objection Form"), attached hereto as Exhibit 3;

16 4. The Court directs the mailing of the Notice, Exclusion Form, and Objection Form
17 by first class mail to the Settlement Class Members in accordance with the schedule set forth below.
18 The Court finds that the dates selected for the mailing and distribution of the Notice, Exclusion
19 Form, and Objection Form, as set forth herein, meet the requirements of due process and provide
20 the best notice practicable under the circumstances and shall constitute due and sufficient notice to
21 all persons entitled thereto. Any Exclusion Form or Objection Form shall be submitted to Phoenix
22 Settlement Administrators (the "Settlement Administrator") rather than filed with the Court. The
23 Settlement Administrator shall file a declaration concurrently with the filing of the final approval
24 motion, authenticating a copy of every Exclusion Form and Objection Form received by the
25 Settlement Administrator;

26 5. It is ordered that the Settlement Class is preliminarily certified for settlement
27 purposes only. The Settlement Class is defined as follows: all non-exempt employees of Defendant
28 Billy Charles Crawford and Cody Alan Crawford, Individuals Doing Business as Crawford

1 Associates in California at any time between June 10, 2020 and October 22, 2024;

2 6. The Aggrieved Employees are defined as all non-exempt employees of Defendant
3 Billy Charles Crawford and Cody Alan Crawford, Individuals Doing Business as Crawford
4 Associates in California at any time between March 21, 2023 and October 22, 2024;

5 7. The Court approves and appoints Gaines & Gaines, APLC and Halavi Law, Inc., as
6 Class Counsel, and grants preliminary approval of an award of attorneys' fees of up to 33.33% of
7 the Gross Settlement Amount (projected to be \$75,000.00) (i.e., Seventy-Five Thousand Seven
8 Hundred Fifty Dollars (\$75,000.00)), with 25% payable to Gaines & Gaines, APLC, 25% payable
9 to Law Offices of Alex P. Katofsky, APC, and 50% payable to Halavi Law, and documented
10 litigation costs of up to \$10,000 to Class Counsel, subject to final approval by the Court following
11 a further motion by Class Counsel;

12 8. The Court approves and appoints Plaintiff Roque Zarate Jr as the Class
13 representative and grants preliminary approval to proposed Service Payment and General Release
14 Payment to Plaintiff Roque Zarate Jr in an amount not to exceed \$10,000, subject to final approval
15 by the Court following a further motion by the Class Representative;

16 9. The Court grants preliminary approval of the allocation of \$12,000 to settle the
17 representative claims under the Private Attorneys General Act (Labor Code §§ 2698 et seq.), of
18 which 75% (\$9,000) shall be paid directly to the LWDA and 25% (\$3,000) shall be paid to
19 Aggrieved Employees as part of the Net Settlement Proceeds;

20 10. The Court hereby approves and appoints Phoenix Settlement Administrators as the
21 Settlement Administrator and grants preliminary approval of the payment of fees and other charges
22 of the Settlement Administrator in an amount not to exceed \$5,000. The Settlement administrator
23 shall perform all services as outlined in the Settlement. The Settlement Administrator must give
24 notice to any objecting party of any continuance of the final approval hearing; and

25 11. The Court orders the following schedule of dates for the specified actions/further
26 proceedings:

<u>EVENT</u>	<u>TIMING</u>
Last day for Defendant to provide to the Settlement Administrator a list of all Class Members and Aggrieved Employees, including their last known addresses, telephone numbers, social security numbers, and their dates of employment in a non-exempt position in California during the Class Period (for Class Members) and the PAGA Period (for Aggrieved Employees) (“Settlement Class Information”)	10 calendar days after entry of Court’s Order granting preliminary approval of Settlement
Last day for Settlement Administrator to mail Notice, Exclusion, and Objection Forms to Class Members	20 calendar days after entry of Court’s Order granting preliminary approval of Settlement
Last day for Class Members to submit a written Exclusion Form to the Settlement Administrator	45 calendar days after the initial mailing of the Notice to Class Members
Last day for Class Members to submit Objection Form to the Settlement Administrator	45 calendar days after the initial mailing of the Notice to Class Members
Last day for Class Counsel to file and serve moving papers in support of final settlement approval and request for attorneys’ fees and costs	16 Court days before the final settlement approval hearing date
Last day for Class Counsel to file with the Court and serve declaration by Settlement Administrator specifying the due diligence undertaken with regard to the mailing of the Notice, Exclusion, and Objection Forms	16 Court days before the final settlement approval hearing date
Final settlement approval hearing	_____, at 8:30 a.m. (approximately 95 days after entry of this Order)

IT IS SO ORDERED.

Dated: _____

JUDGE OF THE SUPERIOR COURT