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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF NAPA**

VICTOR FIGUEROA, ALDEN PEREZ,  
CYNTHIA IZQUIERDO, and KENNETH  
ZIEG on behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

MULTI-COLOR CORPORATION, an Ohio  
Corporation; WS PACKAGING GROUP,  
INC.; and DOES 1-50, inclusive,

Defendants.

Case No.: 24CV000347

*[Assigned to the Hon. Joseph J. Solga,  
Dept. B]*

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

Date: October 20, 2026

Time: 8:30 a.m.

Dept.: B

Action Filed: March 7, 2024

Trial Date: None Set

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1 **[PROPOSED] ORDER**

2 The Motion of Plaintiffs Victor Figueroa, Alden Perez, Cynthia Izquierdo, and Kenneth  
3 Zieg ("Plaintiffs") for Preliminary Approval of Class Action and PAGA Settlement came  
4 regularly for hearing before this court on October 20, 2026, at 8:30 a.m. The Court, having  
5 considered Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement,  
6 the memorandum of points and authorities in support thereof, and supporting declarations filed  
7 therewith; having considered the parties' proposed Class Action and PAGA Settlement  
8 Agreement ("Settlement Agreement" or "Settlement") entered into between Plaintiffs and  
9 Defendants Multi-Color Corporation and W/S Packaging Group, LLC ("Defendants"), attached  
10 as Exhibit 1 to the Declaration of Matthew K. Moen filed concurrently with the Motion; and good  
11 cause appearing, HEREBY ORDERS THE FOLLOWING:

12 1. The Court GRANTS preliminary approval of the class action settlement as set  
13 forth in the Settlement Agreement, and finds its terms to be within the range of reasonableness of  
14 a settlement that ultimately could be granted approval by the Court at a Final Approval hearing.

15 2. The Court preliminarily approves the terms of the Settlement Agreement and finds  
16 that they fall within the range of approval as fair, adequate and reasonable. Based on a review of  
17 the papers submitted by Plaintiffs, the Court finds that the Settlement is the result of arms'-length  
18 negotiations conducted after Plaintiffs and/or Plaintiffs' counsel adequately investigated the  
19 claims and became familiar with the strengths and weaknesses of the claims. The assistance of an  
20 experienced mediator in the settlement process supports the Court's conclusion that the Settlement  
21 is non-collusive and reasonable. The Settlement is presumptively valid, subject only to any  
22 objections that may be raised pursuant to the terms of the Settlement Agreement.

23 3. For purposes of the Settlement, the Court finds that the proposed Settlement Class  
24 is ascertainable and that there is a sufficiently well-defined community of interest among the  
25 members of the Settlement Class in questions of law and fact. Therefore, for settlement purposes  
26 only, the Court grants conditional certification of the following Settlement Class:

27 All individuals who are or were employed by Defendants as non-exempt  
28 hourly employees in California between March 7, 2020 through August 5,  
2025 (the "Class Period").

1           4.     For purposes of the Settlement, the Court designates named Plaintiffs Victor  
2 Figueroa, Alden Perez, Cynthia Izquierdo, and Kenneth Zieg as Class Representatives, and  
3 designates Mehrdad Bokhour of Bokhour Law Group, P.C., Joshua S. Falakassa of Falakassa  
4 Law, P.C., Brian Makin and Misty Lauby of Lauby, Mankin & Lauby LLP, and Paul K. Haines,  
5 Fletcher W. Schmidt, and Matthew K. Moen of Haines Law Group, APC, as Class Counsel.

6           5.     The Court designates ILYM Group, Inc. as the third-party Settlement  
7 Administrator for mailing notices.

8           6.     The Court approves, as to form and content, the Court Approved Notice of Class  
9 Action Settlement and Hearing Date for Final Court Approval (“Class Notice”) attached as  
10 Exhibit A to the Settlement Agreement.

11          7.     The Court finds that the form of notice to the Settlement Class regarding the  
12 pendency of the action and of the Settlement, and the methods of giving notice to Settlement Class  
13 members, constitute the best notice practicable under the circumstances, and constitute valid, due,  
14 and sufficient notice to all Settlement Class members. The form and method of giving notice  
15 complies fully with the requirements of California Code of Civil Procedure section 382, California  
16 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other  
17 applicable law.

18          8.     The Court further approves the procedures for Settlement Class members to opt-  
19 out of or object to the Settlement, as set forth in the Class Notice and the Settlement Agreement.

20          9.     The procedures and requirements for submitting objections in connection with the  
21 Final Approval Hearing are intended to ensure the efficient administration of justice and the  
22 orderly presentation of any Settlement Class member’s objection to the Settlement, in accordance  
23 with the due process rights of all Settlement Class members.

24          10.    The Court directs the Settlement Administrator to mail the Notice Packet to the  
25 Settlement Class Members in English only, in accordance with the terms of the Settlement.

26          11.    Pursuant to the Settlement Agreement, the Class Notice shall provide at least 45  
27 calendar days’ notice for Settlement Class members to submit disputes, opt-out of, or object to  
28 the Settlement.

12. The Final Approval Hearing on the question of whether the Settlement Agreement should be finally approved as fair, reasonable and adequate is scheduled on \_\_\_\_\_, at \_\_\_\_\_ a.m. / p.m. in Department B of this Court, located at 825 Brown Street, Napa, California 94559. The Court reserves the right to continue the date of the Final Approval Hearing without further notice to the Settlement Class members. The Court retains jurisdiction to consider all further applications arising out of or in connection with the Settlement Agreement.

13. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement Agreement should be approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs' application for service payments, settlement administration costs, payment to the California Labor and Workforce Development Agency ("LWDA") for its 75% share of civil penalties under the Private Attorneys General Act ("PAGA"), Labor Code section 2698 *et seq.*, and Class Counsel's attorneys' fees and costs should be granted.

14. Plaintiffs' Counsel shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement and Plaintiffs' application for service payments, settlement administration costs, payment to the LWDA for its share of PAGA penalties, and Class Counsel's attorneys' fees and costs prior to the Final Approval Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

15. An implementation schedule is provided below (assuming the Court grants preliminary approval of the Settlement on October 20, 2026):

| Event                                                                                               | Date              |
|-----------------------------------------------------------------------------------------------------|-------------------|
| Defendants to provide class contact information to Settlement Administrator no later than:          | October 27, 2026  |
| Settlement Administrator to mail the Class Notice to the Settlement Class members no later than:    | November 12, 2026 |
| Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement: | December 28, 2026 |

|                                                                                                |                                                                                                                  |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| Deadline for Plaintiffs to file Motion for Final Approval of Class Action and PAGA Settlement: | At least 16 court days prior to Final Approval Hearing                                                           |
| Final Approval Hearing                                                                         | <input type="checkbox"/> February 16, 2027 at 8:30 a.m.; or<br><input type="checkbox"/> _____ at _____ a.m./p.m. |

16. 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.

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. In the event the Settlement is not finally approved, or otherwise does not become effective in accordance with the terms of the Settlement, this Order shall be rendered null and void and shall be vacated, and the parties shall revert to their respective positions as of before entering into the Settlement.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Joseph J. Solga  
Judge of the Superior Court