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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

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

Plaintiff,

vs.

UAG CERRITOS I, LLC d.b.a. PENSKE
CHEVROLET OF CERRITOS, a California
Limited Liability Company; UAG CERRITOS,
LLC d.b.a. PENSKE BUICK GMC OF
CERRITOS, a Delaware Limited Liability
Company; and DOES 1 through 100,

Defendants.

Case No.: 24STCV09094

*[Assigned for all purposes to Hon. David S.
Cunningham III, Dept. SSC-11]*

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

Date: October 7, 2026
Time: 10:15 a.m.
Dept.: SSC-11

Complaint Filed: April 10, 2024
Trial Date: None Set

1 The Motion of Plaintiff Jerammy Sanchez (“Plaintiff”) for Preliminary Approval of Class
2 Action Settlement came on regularly for hearing before this Court on October 7, 2026 at 10:15
3 a.m. This Court, having considered the proposed Stipulation of Settlement (the “Settlement”),
4 attached as Exhibit 1 to the Declaration of Sean M. Blakely filed concurrently herein; having
5 considered Plaintiff’s Motion for Preliminary Approval of Class Action Settlement,
6 Memorandum of Points and Authorities in support thereof, Plaintiff’s Supplemental Briefing, and
7 supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE
8 FOLLOWING:

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

16 All current and former non-exempt employees who worked for Defendants
17 UAG Cerritos I, LLC d.b.a. Penske Chevrolet of Cerritos and UAG
18 Cerritos, LLC d.b.a. Penske Buick GMC of Cerritos (“Defendants”) in
19 California from April 10, 2023, through September 2, 2025 (“Class
20 Period”).

21 2. For purposes of the Settlement, the Court designates named Plaintiff Jerammy
22 Sanchez as Class Representative, and designates Paul K. Haines and Sean M. Blakely of Haines
23 Law Group, APC as Class Counsel.

24 3. The Court designates Phoenix Settlement Administrators as the third-party
25 Settlement Administrator for mailing notices.

26 4. The Court approves, as to form and content, the Class Notice and Notice of
27 Estimated Settlement Payment (collectively, the “Notice Packet”), attached as Exhibits 1 and 2,
28 respectively, to this Settlement.

5. The Court finds that the form of notice to the Settlement Class regarding the
pendency of the action and of the Settlement, and the methods of giving notice to members of the

1 Settlement Class, constitute the best notice practicable under the circumstances, and constitute
2 valid, due, and sufficient notice to all of the Settlement Class members. The form and method of
3 giving notice complies fully with the requirements of California Code of Civil Procedure section
4 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California
5 and United States Constitutions, and other applicable law.

6 6. The Court further approves the procedures for the Settlement Class members to
7 opt out of or object to the Settlement, as set forth in the Class Notice.

8 7. The procedures and requirements for filing objections in connection with the Final
9 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
10 presentation of any Settlement Class member's objection to the Settlement in accordance with the
11 due process rights of all members of the Settlement Class.

12 8. The Court directs the Settlement Administrator to mail the Notice Packet to the
13 members of the Settlement Class in accordance with the terms of the Settlement. The Court directs
14 the Settlement Administrator to carry out all duties as required by the Settlement.

15 9. The Class Notice shall provide at least sixty (60) calendar days' notice for
16 members of the Settlement Class to opt out of, or object to the Settlement.

17 10. The Final Approval Hearing on the question of whether the Settlement should be
18 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-11 of this
19 Court, located at 312 N Spring St, Los Angeles, CA 90012 on _____, 2027 at _____ a.m.

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

27 12. Counsel for the parties shall file memoranda, declarations, or other statements and
28 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation

expenses, Plaintiff's Enhancement Payment, payment to the LWDA, and settlement administration 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.

13. An implementation schedule is below:

Event	Date
Defendants to provide Class Data to the Settlement Administrator no later than [10 business days after preliminary approval]:	October 21, 2026
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	November 4, 2026
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement, or submit a dispute [60 calendar days after mailing]:	January 4, 2027
Deadline for Plaintiff to file his Motion for Final Approval of Class Action Settlement:	February 4, 2027
Final Approval Hearing:	_____, 2027 at ____ a.m.

14. 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.

15. 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: _____, 2026

Hon. David S. Cunningham III
Judge of the Superior Court