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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**IN AND FOR THE COUNTY OF SAN DIEGO**

ERIC SANCHEZ on behalf of himself, all  
others similarly situated, and on behalf of the  
general public,

Plaintiff,

v.

J & L INSULATION, INC.; and DOES 1-  
100,

Defendants.

Case No. 37-2024-00019764-CU-OE-CTL  
[Consolidated with Case No. 37-2024-  
00029776-CU-OE-CTL]

**[PROPOSED] ORDER GRANTING  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT, CONDITIONAL  
CERTIFICATION, APPROVAL OF  
CLASS NOTICE, SETTING OF FINAL  
APPROVAL HEARING DATE**

Date: September 12, 2025  
Time: 9:00 a.m.  
Dept.: C-60

1 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

2 The Motion for Preliminary Approval of Class Action Settlement came before this Court,  
3 the Honorable Matthew C. Braner presiding, on September 12, 2025. The Court having  
4 considered the papers submitted in support of the Motion, HEREBY ORDERS THE  
5 FOLLOWING:

6 1. The following Class is conditionally certified for purposes of settlement only: All  
7 current and former non-exempt employees of Defendant who worked within the State of  
8 California at any time from April 26, 2020 to June 20, 2025.

9 2. The Court grants preliminary approval of the Settlement and the Class based upon  
10 the terms set forth in the Settlement Agreement filed herewith. Capitalized terms shall have the  
11 definitions set forth in the Settlement.

12 3. The Settlement appears to be fair, adequate and reasonable to the Class. The  
13 Settlement falls within the range of reasonableness and appears to be presumptively valid,  
14 subject only to any objections that may be raised at the final approval hearing and final approval  
15 by this Court.

16 5. Plaintiff Eric Sanchez is conditionally approved as the Class Representative for  
17 the Class.

18 6. The proposed Class Representative Enhancement Payment of \$10,000 payable to  
19 the Plaintiff for his services as the class representative is conditionally approved.

20 7. David Mara and Matthew Crawford of Mara Law Firm, PC are conditionally  
21 approved as Class Counsel for the Class.

22 8. The proposed awards of up to \$50,000 in attorneys' fees and up to \$13,000 in  
23 actual costs payable to Class Counsel are conditionally approved.

24 9. A final approval hearing on the question of whether the Settlement, attorneys'  
25 fees and costs to Class Counsel, and the Class Representative Enhancement Payment should be  
26 finally approved as fair, reasonable and adequate as to Class Members is scheduled in  
27 Department C-60 on the date and time set forth in Paragraph 16 below.

1           10.    The Court confirms Apex Class Action LLC (“Apex”) as the Settlement  
2 Administrator.

3           11.    The proposed payment of no more than \$5,000 in costs to Apex for its services as  
4 the Settlement Administrator is conditionally approved.

5           12.    The Court hereby preliminarily approves the allocation of \$2,000 of the Gross  
6 Settlement Amount to Plaintiff’s PAGA claims. Of this amount, 75% will be paid to the Labor  
7 and Workforce Development Agency (“LWDA”) and the remaining 25% will be distributed to  
8 the Aggrieved Employees. At the Final Approval Hearing, the Court will determine the  
9 sufficiency of the PAGA payment. If the Court decides to award less than the amounts set forth  
10 by the Parties, then excess amount will become part of the available Net Settlement Amount.

11           13.    The Court approves, as to form and content, the Notice in substantially the form  
12 attached as Exhibit A to the Settlement. The Court approves the procedure for Class Members to  
13 participate in, to opt out of, and to object to, the Settlement as set forth in the Notice of  
14 Settlement.

15           14.    The Court directs the mailing of the Notice by first class mail to Class Members  
16 in accordance with the implementation schedule set forth in Paragraph 16 below. The Court  
17 finds the dates selected for the mailing and distribution of the Notice, as set forth in the  
18 Implementation Schedule, meet the requirements of due process and provide the best notice  
19 practicable under the circumstances and shall constitute due and sufficient notice to all persons  
20 entitled thereto.

21           15.    To facilitate administration of the Settlement pending final approval, the Court  
22 hereby enjoins Plaintiffs and all Class Members from filing or prosecuting any claims, suits or  
23 administrative proceedings (including, but not limited to, filing claims with the Division of  
24 Labor Standards Enforcement of the California Department of Industrial Relations) regarding  
25 claims released by the Settlement unless and until such Class Members have filed valid Requests  
26 for Exclusion with the Settlement Administrator and the time for filing valid Requests for  
27 Exclusion with the Settlement Administrator has elapsed. This provision shall not apply to  
28

claims not alleged in the Action.

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

|    |                                                                                         |                                                                  |
|----|-----------------------------------------------------------------------------------------|------------------------------------------------------------------|
| a. | Deadline for Defendant to submit Class Data to Settlement Administrator:                | [10 business days after entry of the Preliminary Approval Order] |
| b. | Deadline for Settlement Administrator to Mail the Notice to Class Members               | [10 business days after receipt of the Class Data]               |
| c. | Deadline for Class Members to Postmark Requests for Exclusion Forms                     | [30 days after mailing of Notice to Class Members]               |
| d. | Deadline for Receipt by Court and Counsel of any Objections to the Settlement           | [30 days after mailing of Notice to Class Members]               |
| e. | Deadline for Class Counsel to file Motion for Final Approval of Settlement              | [16 Court days before Final Approval Hearing]                    |
| f. | Deadline for Class Counsel to file Motion for Attorneys' Fees, Costs and Service Awards | [16 Court days before Final Approval Hearing]                    |
| g. | Final Approval Hearing and Final Approval                                               | _____, 2026<br>_____                                             |

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

BY \_\_\_\_\_  
Honorable Matthew C. Braner  
San Diego Superior Court Judge