

Karen I. Gold (State Bar No. 259031)
kgold@blackstonepc.com
Marissa A. Mayhood (State Bar No. 334376)
mmayhood@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jasmine Y. Kianfard (State Bar No. 349975)
jkianfard@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff JUAN CAMPOS-
LEDEZMA, individually and on behalf of
others similarly situated & HECTOR
SANCHEZ, individually, and on behalf of
other similarly situated employees and
aggrieved employees pursuant to PAGA

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

JUAN CAMPOS-LEDEZMA, individually
and on behalf of others similarly situated, &
HECTOR SANCHEZ, individually, and on
behalf of other similarly situated employees
and aggrieved employees pursuant to PAGA,

Plaintiff,

vs.

INSITUTE FOR ENVIRONMENTAL
HEALTH, INC., a Washington Corporation;
and DOES 1 through 25, inclusive,

Defendants.

Case No.: CV-23-006693

Honorable Stacy P. Speiller
Department 22

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

Date: October 15, 2025
Time: 8:30 a.m.
Dept.: 22

Complaint Filed: November 14, 2023
FAC Filed: February 4, 2025
Trial Date: Not Set

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

On October 15, 2025 at 8:30 a.m. in Department 22 of the above-captioned Court located at 1010 10th Street, Sixth Floor, Modesto, California 95354, Plaintiffs Juan Campos-Ledezma's and Hector Sanchez's (together, "Plaintiffs") Motion for Preliminary Approval of Class Action and PAGA Settlement, came on for hearing before the Honorable Stacy P. Speiller. Blackstone Law, APC appeared on behalf of Plaintiffs and Gordon Rees Scully Mansukhani, LLP appeared on behalf of Defendant Institute of Environmental Health, Inc. ("Defendant").

The Court, having carefully considered the papers, argument of counsel, and all matters presented to the Court, and good cause appearing, hereby **GRANTS** Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

IT IS HEREBY ORDERED THAT:

1. The Court preliminarily approves the Joint Stipulation of Class Action and PAGA Settlement ("Settlement" or "Settlement Agreement") attached as Exhibit 3 to the Declaration of Alexandra Rose in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement. This is based on the Court's determination that the Settlement falls within the range of possible approval as fair, adequate, and reasonable.

2. This Order incorporates by reference the definitions in the Settlement Agreement, and all capitalized terms defined therein shall have the same meaning in this Order as set forth in the Settlement Agreement.

3. It appears to the Court on a preliminary basis that the Settlement is fair, adequate, and reasonable. It appears to the Court that extensive investigation and research have been conducted such that counsel for the parties at this time are able to reasonably evaluate their respective positions. It further appears to the Court that the Settlement, at this time, will avoid substantial additional costs by all parties, as well as avoid the delay and risks that would be presented by the further prosecution of the case. It further appears that the Settlement has been reached as the result of intensive, serious, and non-collusive, arms-length negotiations, and was entered into in good faith.

4. The Court preliminarily finds that the Settlement, including the allocations for the Attorneys' Fees and Costs, Enhancement Payment, LWDA Payment, Settlement Administration Costs, and payments to the Settlement Class Members and PAGA Employees provided for in the

1 Settlement Agreement, appear to be within the range of reasonableness of a settlement that could
2 ultimately be given final approval by this Court. Indeed, the Court has reviewed the monetary recovery
3 that is being granted as part of the Settlement and preliminarily finds that the monetary settlement
4 awards made available to the Class Members and PAGA Employees are fair, adequate, and reasonable
5 when balanced against the probable outcome of further litigation relating to certification, liability, and
6 damages issues and are consistent with the requirements of California Labor Code § 2699(1).

7 5. The Court concludes that, for settlement purposes only, the proposed Class meets the
8 requirements for certification under section 382 of the California Code of Civil Procedure in that: (a)
9 the Class is ascertainable and so numerous that joinder of all members of the Class is impracticable;
10 (b) common questions of law and fact predominate, and there is a well-defined community of interest
11 amongst the members of the Class with respect to the subject matter of the litigation; (c) Plaintiffs’
12 claims are typical of the claims of the members of the Class; (d) Plaintiffs will fairly and adequately
13 protect the interests of the members of the Class; (e) a class action is superior to other available
14 methods for the efficient adjudication of the controversy; and (f) Class Counsel is qualified to act as
15 counsel for Plaintiffs in their individual capacities and as the representatives of the Class.

16 6. The Court conditionally certifies, for settlement purposes only, the Class, defined as
17 follows:

18 All current and former hourly-paid and/or non-exempt employees who worked for
19 Defendant in the State of California at any time during the Class Period.

20 (The Class Period is defined as the period from November 14, 2019 through
21 January 15, 2025.)

22 7. The Court provisionally appoints Jonathan M. Genish, Karen I. Gold, Marissa A.
23 Mayhood, Alexandra Rose, and Jasmine Y. Kianfard of Blackstone Law, APC as counsel for the Class
24 (“Class Counsel”).

25 8. The Court provisionally appoints Plaintiffs Juan Campos-Ledezma and Hector Sanchez
26 as the representatives of the Class (“Class Representatives”).

27 9. The Court provisionally appoints CPT Group, Inc. to handle the administration of the
28 Settlement (“Settlement Administrator”).

///

1 10. Within fifteen (15) business days after entry of this Order, Defendant will provide the
2 Settlement Administrator with the following information about each Class Member: full name, last
3 known mailing address, Social Security number, number of Workweeks, number of Pay Periods (if
4 applicable), and amount of their Prior Paid Individual Amount (if applicable) (collectively referred to
5 as the “Class List”) in conformity with the Settlement Agreement.

6 11. The Court approves, both as to form and content, the Notice of Class Action Settlement
7 (“Class Notice”) attached hereto as **Exhibit 1**. The Class Notice shall be provided to Class Members
8 in the manner set forth in the Settlement Agreement. The Court finds that the Class Notice appears to
9 fully and accurately inform the Class Members of all material elements of the Settlement, of Class
10 Members’ right to be excluded from the Class Settlement by submitting a Request for Exclusion, of
11 Class Members’ right to dispute the Workweeks and/or Pay Periods credited to each of them by
12 submitting a Dispute, and of each Settlement Class Member’s right and opportunity to object to the
13 Class Settlement by submitting a Notice of Objection to the Settlement Administrator. The Court
14 further finds that distribution of the Class Notice substantially in the manner and form set forth in the
15 Settlement Agreement and this Order, and that all other dates set forth in the Settlement Agreement
16 and this Order, meet the requirements of due process and shall constitute due and sufficient notice to
17 all persons entitled thereto. The Court further orders the Settlement Administrator to mail the Class
18 Notice in English and Spanish by First-Class U.S. Mail to all Class Members within seven (7) calendar
19 days of receipt of the Class List, pursuant to the terms set forth in the Settlement Agreement.

20 12. The Court hereby preliminarily approves the proposed procedure, set forth in the
21 Settlement Agreement, for seeking exclusion from the Class Settlement. Any Class Member may
22 choose to be excluded from the Class Settlement by submitting a Request for Exclusion in conformity
23 with the requirements set forth in the Class Notice, to the Settlement Administrator, postmarked on or
24 before the date that is forty-five (45) calendar days from the initial mailing of the Class Notice by the
25 Settlement Administrator to Class Members (“Response Deadline”), or, in the case of a re-mailed
26 Class Notice, the Response Deadline shall be extended fifteen (15) calendar days from the original
27 Response Deadline. Any such person who timely and validly chooses to opt out of, and be excluded
28 from, the Class Settlement will not be entitled to any recovery under the Class Settlement and will not

1 be bound by the Class Settlement or have any right to object, appeal, or comment thereon.
2 Nevertheless, all PAGA Employees will be bound by the PAGA Settlement and issued their Individual
3 PAGA Payment, irrespective of whether they submit a Request for Exclusion. Class Members who
4 do not submit a timely and valid Request for Exclusion (i.e., Settlement Class Members) shall be
5 bound by the Settlement Agreement and any final judgment based thereon.

6 13. A Final Approval Hearing shall be held before this Court on
7 _____ at _____ a.m./p.m. in Department 22 of the Stanislaus
8 County Superior Court, located at 1010 10th Street, Sixth Floor, Modesto, California 95354, to
9 determine all necessary matters concerning the Settlement, including: whether the proposed settlement
10 of the action on the terms and conditions provided for in the Settlement is fair, adequate, and
11 reasonable and should be finally approved by the Court; whether a judgment, as provided in the
12 Settlement, should be entered herein; whether the plan of allocation contained in the Settlement should
13 be approved as fair, adequate, and reasonable to the Class Members and PAGA Employees; and
14 determine whether to approve the requests for the Attorneys' Fees and Costs, Enhancement Payment,
15 Settlement Administration Costs, and allocation for the PAGA Amount.

16 14. Class Counsel shall file a motion for final approval of the Settlement and for Attorneys'
17 Fees and Costs, Enhancement Payment, and Settlement Administration Costs, along with the
18 appropriate declarations and supporting evidence, including the Settlement Administrator's
19 declaration, by _____, to be heard at the Final Approval Hearing.

20 15. To object to the Class Settlement, a Settlement Class Member must submit their Notice
21 of Objection to the Settlement Administrator on or before the Response Deadline. The Notice of
22 Objection must be signed and must contain the information that is required, as set forth in the Class
23 Notice, including and not limited to the grounds for the objection. Settlement Class Members,
24 individually or through counsel, may also present their objection orally at the Final Approval Hearing,
25 regardless of whether they have submitted a Notice of Objection.

26 16. In the event the Settlement does not become effective in accordance with the terms of
27 the Settlement Agreement, or the Settlement is not finally approved, or is terminated, canceled, or fails
28 to become effective for any reason, this Order shall be rendered null and void, shall be vacated, and

1 the parties shall revert back to their respective positions as of before entering into the Settlement
2 Agreement. The fact that the Court certified the Class for settlement purposes shall not be admissible
3 or have any bearing on the issue of whether any class should be certified in a non-settlement context.

4 17. The Court reserves the right to adjourn or continue the date of the Final Approval
5 Hearing and any dates provided for in the Settlement Agreement without further notice to the Class
6 Members and retains jurisdiction to consider all further applications arising out of or connected with
7 the Settlement.

8 **IT IS SO ORDERED.**

9 Dated: _____

Honorable Stacy P. Speiller
Judge of the Superior Court