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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ANTONIO ROSILLO, ALONDRA BECERRIL ALBARRAN, and ELVA PENA, on behalf of all others similarly situated and the State of California under the Private Attorneys General Act,

Plaintiffs,

vs.

BRODY HEATING, AIR CONDITIONING & ELECTRICAL CONTRACTORS, LLC and DOES 1 through 50, inclusive,

Defendants.

Case No. 24STCV10881
(Consolidated with 24STCV16328)

[Assigned for All Purposes to:
Hon. Theresa M. Traber, Dept. 1]

(PROPOSED) ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

(Filed concurrently with Motion for Preliminary Approval and Supporting Declarations)

DATE: February 24, 2027
TIME: 10:00 a.m.
DEPT: 1

Action Filed: April 30, 2024
Trial Date: Not Set

The Motion of Antonio Rosillo, Alondra Becerril Albarran, and Elva Pena ("Plaintiffs") for Preliminary Approval of Class Action and PAGA Settlement came on regularly for hearing before this Court. This Court, having considered the proposed Class Action and PAGA Settlement Agreement (the "Agreement" or "Settlement") attached to the Declaration of William C. Sung filed concurrently herein; having considered Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Memorandum of Points and Authorities in support thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

> All hourly, non-exempt employees who worked for Defendant Brody Heating, Air Conditioning & Electrical Contractors, LLC in California during the Class Period of April 30, 2020 to August 5, 2026.

2. For purposes of the Settlement, the Court designates Plaintiffs as Class Representatives;

3. For purposes of the Settlement, the Court designates Nicolas J. Ferraro, Lauren Vega, Rick Waltman, Ricardo De Leon, and Conor J.D. Gómez of Ferraro Vega Employment Lawyers, Inc., and William C. Sung, Tiffany L. Luu, and Joseph C. Ramli of Justice for Workers, P.C. as Class Counsel.

4. The Court designates Apex Class Action LLC as the third-party Administrator for mailing notices.

5. The Court approves, as to form and content, the Class Notice attached as Exhibit A to the Agreement.

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6. The Court finds that the form of notice to the Class regarding the pendency of the action and of the Settlement, and the methods of giving notice to Class Members, constitute the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all of the Class Members. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

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

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

9. The Court directs the Administrator to mail the Class Notice to Class Members in accordance with the terms of the Settlement.

10. The Class Notice shall provide at least forty-five (45) calendar days' notice for Class Members to opt out of, or object to, the Settlement.

11. The Final Approval Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 1 of this Court, located at Spring Street Courthouse, 312 North Spring Street, Los Angeles, CA 90012 on _____, 2027 at ____ a.m.

12. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs' application for reasonable attorneys' fees, reimbursement of litigation expenses, service award to Plaintiffs, settlement administration costs, and payment to the Labor & Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act should be granted.

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13. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiffs' service payment, payment to the LWDA, and settlement administration costs, no later than 16 court days prior to the Final Approval Hearing.

14. An implementation schedule is below:

Event	Date
Defendant to provide the Administrator with the Class Data	Within 15 calendar days after entry of this Order
Administrator to mail the Class Notice	Within 14 calendar days after receiving the Class Data from Defendant
Response Deadline for Class Members	Within 45 calendar days after the Administrator mails the Class Notice (extended by 14 calendar days for any re-mailed initial Class Notices)
Last Day to File a Motion for Final Approval of Class Action and PAGA Settlement	At least 16 court days before the Final Approval Hearing:
Final Approval Hearing	_____ at ___ a.m.

15. 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.

16. 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. Theresa M. Traber
Judge of the Superior Court