SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SANDRA BRAVO, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

FOOTHILL CHILD DEVELOPMENT SERVICES, INC., a California Corporation; and DOES 1 through 100,

Defendants.

Case No.: 24STCV18240

[*Case Assigned for all purposes to the Hon. Timothy Patrick Dillon, Dept. SSC-15*]

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

Date: January 13, 2027
Time: 10:00 a.m.
Dept.: SSC-15

Complaint Filed: July 23, 2024
Trial Date: None Set

Plaintiff Sandra Bravo's ("Plaintiff") Motion for Preliminary Approval of Class and PAGA Action Settlement came regularly for hearing before this Court on January 13, 2027, at 10:00 a.m. The Court, having considered the proposed Class Action and PAGA Settlement Agreement and Class Notice ("Settlement Agreement"), attached as Exhibit 1 to the Declaration of Andrew J. Rowbotham, filed concurrently with Plaintiff's Motion for Preliminary Approval of Class and PAGA Action Settlement, the 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 and PAGA action settlement as set forth in the Settlement Agreement 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 Settlement Class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the Settlement Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants conditional certification of the following Settlement Class:

> All current and former non-exempt employees who worked for Defendant Foothill Child Development Services, Inc. ("Defendant") in California at any time from July 23, 2020, through the Preliminary Approval Date.

2. For purposes of the Settlement, the Court designates named Plaintiff Sandra Bravo as the Class Representative and designates Paul K. Haines, Fletcher W. Schmidt, Andrew J. Rowbotham, and Susan J. Perez of Haines Law Group, APC as Class Counsel.

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

4. The Court approves, as to form and content, the Court Approved Notice of Class Action and PAGA Settlement and Hearing Date for Final Court Approval ("Class Notice") attached as Exhibit A to the Settlement Agreement.

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

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

6. The Court further approves the procedures for Class Members to opt out of or object to the Settlement, as set forth in the Court Approved Notice of Class Action and PAGA Settlement and Hearing Date for Final Court Approval.

7. The procedures and requirements for submitting written 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 Class Members.

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

9. The Class Notice shall provide at least 60 calendar days' notice for members of the Settlement Class to opt out of, or object to the Settlement. The Settlement Administrator will submit a declaration to the Court that attests to the total number of Requests for Exclusion and written Objections received from the Class Members, if any. Upon receipt of any Requests for Exclusion or Objections, the Settlement Administrator shall forward copies of all Requests for Exclusion and Objections to counsel for all parties.

10. The Final Approval Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 15 of this Court, located at 312 North Spring Street, Los Angeles, CA 90012 on June 1, 2027, at 10:00 a.m. or_____, at _____a.m./p.m.

11. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement should be finally 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 Plaintiff's

application for reasonable attorneys' fees, reimbursement of litigation expenses, class representative enhancement payment to Plaintiff, settlement administration costs, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Private Attorneys General Act ("PAGA") should be granted.

12. 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, Plaintiff's class representative enhancement payment, settlement administration costs, and payment to the LWDA for PAGA penalties 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 (assuming the Court signs this Order on January 13, 2027):

Event	**Date**
Defendant to provide Class Member information to the Settlement Administrator no later than [14 calendar days after preliminary approval]:	January 27, 2027
Settlement Administrator to mail Class Notice to Class Members no later than [10 business days from receipt of Class Member information]:	February 10, 2027
Deadline for Class Members to request exclusion from, submit dispute, or object to the Settlement [60 calendar days from mailing of Class Notice]:	April 12, 2027
Remail Response Deadline	April 26, 2027
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	At least 16 court days prior to Final Approval Hearing
Final Approval Hearing:	June 1, 2027, at 10:00 a.m. or _____, at _____a.m./p.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: _____

_____
Honorable Timothy Patrick Dillon
Judge of the Superior Court