HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

HECTOR HERNANDEZ AVILA, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

MOSS MANAGEMENT SERVICES, INC., a California corporation; and DOES 1 through 100,

Defendants.

Case No. 24STCV15560

[*Case assigned for all purposes to the Hon. William F. Highberger, Dept. SSC-10*]

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

Date: March 17, 2027
Time: 2:00 p.m.
Dept.: SSC-10

Action Filed: June 21, 2024
Trial Date: None Set

The Motion of Plaintiff Hector Hernandez Avila ("Plaintiff") for Preliminary Approval of Class Action and PAGA Settlement came on regularly for hearing before this Court, on March 17, 2027, at 2:00 p.m. This Court, having considered the proposed Stipulation of Settlement (the "Settlement") attached to the Declaration of Sean M. Blakely filed concurrently herein; having considered Plaintiff's 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 Fairness 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 of Defendant Moss Management Services, Inc. in the State of California who worked between June 21, 2020 and March 2, 2026 (the "Class Period").

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

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

4. The Court approves, as to form and content, the Class Notice and Notice of Estimated Individual Settlement Payment (collectively, the "Notice Packet"), attached as Exhibits 1 and 2, respectively, to the 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 Settlement Class, constitute the best notice practicable under the circumstances, and constitute

valid, due, and sufficient notice to all of the Settlement 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.

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

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

8. The Court directs the Settlement Administrator to mail the Notice Packet to the members of the Settlement Class in accordance with the terms of the Settlement.

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

10. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department SSC-10 of this Court, located at 312 North Spring Street, Los Angeles, California 90012, on _____, 2027 at _____.

11. At the Final Fairness 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, enhancement payment to Plaintiff, and settlement administration costs 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 enhancement payment, and settlement administration costs, prior to the Final Fairness 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**
Defendant to provide Class Data to the Settlement Administrator no later than [7 business days after preliminary approval]:	March 26, 2027
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	April 9, 2027
Deadline for Settlement Class members to request exclusion from, submit a workweek dispute, or object to, the Settlement [60 calendar days after mailing]:	June 8, 2027
Deadline for Plaintiff to file Motion for Final Approval of Class Action and PAGA Settlement:	July 2, 2027
Final Fairness Hearing:	_____

14. Pending the Final Fairness 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. William F. Highberger
Judge of the Superior Court