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individually and on behalf of others similarly
situated

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

MARICELA HERNANDEZ ROJAS,
individually, and on behalf of all others similarly
situated,

Plaintiff,

v.

AMGEN INC., a Delaware corporation, and
DOES 1 through 10, inclusive,
Defendants.

Case No. 2024CUOE025580

*Assigned for all purposes to:
Hon. Charmaine H. Buehner, Dept. 21*

[PROPOSED] ORDER:

**(1) PRELIMINARILY APPROVING
PROPOSED SETTLEMENT;**

**(2) CONDITIONALLY CERTIFYING
SETTLEMENT CLASS;**

**(3) APPOINTING CLASS
REPRESENTATIVE, CLASS COUNSEL,
AND SETTLEMENT ADMINISTRATOR;**

**(4) APPROVING CLASS NOTICE AND
RELATED MATERIALS; AND**

**(5) SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Date: May 8, 2025
Time: 8:30 a.m.
Dept.: 21

1 The motion of plaintiff Maricela Hernandez Rojas (“Plaintiff”) and defendant Amgen Inc.
2 (“Defendant” or “Amgen” for Preliminary Approval of Class Action Settlement (the “Motion”)
3 came on regularly for hearing before this Court on May 8, 2025 at 8:30 a.m. The Court, having
4 considered the proposed Settlement Agreement (the “Settlement”) between Plaintiff and
5 Defendant, attached as Exhibit 1 to the Declaration of John G. Yslas filed concurrently with the
6 Motion; having considered the Motion, Memorandum of Points and Authorities in support thereof,
7 and supporting declarations filed therewith, and any argument presented at the hearing on the
8 Motion; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

16 All current and former employees who worked for Amgen in a non-exempt
17 position in California at any time from May 31, 2020 through February 1,
2025.

18 2. For purposes of the Settlement, the Court designates plaintiff Maricela Hernandez
19 Rojas as Class Representative, and designates John G. Yslas, Samantha A. Smith, Eugene
20 Zinovyev, and Gabriella Sole of the Wilshire Law Firm, PLC as Class Counsel.

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

23 4. The Court approves, as to form and content, the Notice of Proposed Settlement,
24 Conditional Certification of Settlement Class, Preliminary Approval of Settlement, and Hearing
25 Date for Final Court Approval (“Class Notice”), and the Notice of Estimated Settlement Payment,
26 attached as Exhibit A and Exhibit B, respectively, to the Settlement (collectively, the “Class Notice
27 Packet”).

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

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

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

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

15 9. The Class Notice shall provide at least 45 calendar days' notice from the date of
16 initial mailing for Class Members to object to the Settlement, opt out of the Settlement, or submit
17 disputes regarding the information shown on their Notices of Estimated Settlement Share.

18 10. The Final Approval Hearing on the question of whether the Settlement should be
19 finally approved as fair, reasonable, and adequate is scheduled in Department 21 of this Court,
20 located at 800 South Victoria Avenue, Ventura, California 93009, on **September 12, 2025 at 8:30**
21 **a.m.**

22 11. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
23 should be finally approved as fair, reasonable, and adequate for the Class; (b) whether a judgment
24 granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application
25 for reasonable attorneys' fees, reimbursement of litigation expenses, representative payment to
26 Plaintiff, and settlement administration costs should be granted.

27 12. Counsel for the Parties shall file memoranda, declarations, or other statements and
28 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation

1 expenses, Plaintiff's representative payment, and settlement administration costs prior to the Final
2 Approval Hearing according to the time limits set by the Code of Civil Procedure and the
3 California Rules of Court.

4 13. An implementation schedule is below:

5 Event	Date
6 Amgen to provide Class Member Information to 7 Settlement Administrator no later than [30 days after 8 preliminary approval]:	June 9, 2025
9 Settlement Administrator to mail Class Notice Packets to 10 Class Members no later than [14 days after receiving Class 11 Member Information]:	June 23, 2025
12 Deadline for Class Members to object to the Settlement, 13 opt out of the Settlement, or submit disputes to the 14 Settlement Administrator regarding information shown on 15 Notices of Estimated Settlement Share [45 days after 16 mailing of Class Notice Packets or 60 days if notice is 17 returned as undeliverable and remailed]:	August 7, 2025 or August 22, 2025 for any notice returned as undeliverable and remailed
18 Deadline for Parties to file Motion for Final Approval of 19 Class Action Settlement:	August 20, 2025
20 Final Approval Hearing:	September 12, 2025

21 14. Pending the Final Approval Hearing, all proceedings in this action, other than
22 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this
23 Order, are stayed.

24 15. Counsel for the Parties are hereby authorized to utilize all reasonable procedures in
25 connection with the administration of the Settlement which are not materially inconsistent with
26 either this Order or the terms of the Settlement.

27 **IT IS SO ORDERED.**

28 Dated: _____, 2025

Charmaine H. Buehner
Judge of the Superior Court