

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
eugene.zinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
john.brown@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

CAMERON NICHOLSON, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

PRIMUS GROUP, INC., a California
corporation; LUTRELL STAFFING, INC., a
Tennessee corporation; LUTRELL STAFFING
CALIFONRIA, LLC, a Tennessee limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA
08/14/2026
Angela Braun, Executive Officer
BY Rosales, Michael Deputy Clerk

Case No.: 24CV03043

*Assigned for All Purposes to:
Hon. James F. Rigali
Dept. 2*

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

PRELIMINARY APPROVAL HEARING:

Date: June 30, 2026
Time: 8:30 a.m.
Dept.: 2

~~**PROPOSED**~~ **ORDER**

Having reviewed plaintiff Cameron Nicholson's ("Plaintiff") Motion for Preliminary Approval of Class Action and PAGA Settlement ("Motion"), the Declaration of John G. Yslas, and the Class Action and PAGA Settlement Agreement ("Settlement Agreement"), and good cause appearing, the Court finds and orders as follows:

1. The Court finds on a preliminary basis that the Settlement Agreement appears to be fair, adequate, and reasonable and therefore meets the requirements for preliminary approval. The Court grants preliminary approval of the Settlement and the Settlement Class based on the terms set forth in the Settlement Agreement between Plaintiff and defendants Primus Group, Inc., Lutrell Staffing, Inc., and Lutrell Staffing California, LLC ("Defendants"), attached to the Declaration of John G. Yslas in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement as **Exhibit 2**.

2. The Settlement falls within the range of reasonableness of a settlement which could ultimately be given final approval by this Court, and appears to be presumptively valid, subject only to any objections that may be raised at the Final Approval Hearing and final approval by this Court. The Court notes that Defendants have agreed to create a common fund of \$625,000.00 to cover (a) settlement payments to Class Members who do not validly opt out; (b) a \$31,250.00 allocation toward civil penalties under the Private Attorneys General Act, 75% of which (\$23,437.50) will be paid to the State of California, Labor & Workforce Development Agency and 25% of which (\$7,812.50) will be paid to eligible Aggrieved Employees; (c) Class Representative Service Payment of up to \$10,000.00 to Plaintiff; (d) Class Counsel's attorneys' fees, not to exceed one-third (1/3) of the Gross Settlement Amount (i.e., \$208,333.33), and up to \$25,000.00 in costs for actual litigation expenses incurred by Class Counsel; and (e) Settlement Administration Costs of up to \$6,650.00.

3. The Court preliminarily finds that the terms of the Settlement appear to be within the range of possible approval, pursuant to California Code of Civil Procedure § 382 and applicable law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair and reasonable to the Class Members when balanced against the probable outcome of further

1 litigation relating to class certification, liability and damages issues, and potential appeals; (2)
2 significant informal discovery, investigation, research, and litigation have been conducted such
3 that counsel for the Parties at this time are able to reasonably evaluate their respective positions;
4 (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented
5 by the further prosecution of the litigation; and (4) the proposed Settlement has been reached as
6 the result of intensive, serious, and non-collusive negotiations between the Parties with the
7 assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds
8 that the Settlement Agreement was entered into in good faith.

9 4. A final fairness hearing on the question of whether the proposed Settlement,
10 attorneys' fees and costs to Class Counsel, payment to the State of California, Labor &
11 Workforce Development Agency for its share of the settlement of claims for penalties under the
12 Private Attorneys General Act, and a Class Representative Service Payment should be finally
13 approved as fair, reasonable and adequate as to the members of the Class is hereby set in
14 accordance with the Implementation Schedule set forth below.

15 5. The Court provisionally certifies for settlement purposes only the following class
16 (the "Class"): "all persons who worked for Defendants in California as an hourly-paid or non-
17 exempt employee at any time during the Class Period."

18 6. "Class Period" means the period from May 30, 2020, through November 23, 2025.

19 7. The Court finds, for settlement purposes only, that the Settlement Class meets the
20 requirements for certification under California Code of Civil Procedure § 382 in that: (1) the
21 Settlement Class Members are so numerous that joinder is impractical; (2) there are questions
22 of law and fact that are common, or of general interest, to all Settlement Class Members, which
23 predominate over individual issues; (3) Plaintiff's claims are typical of the claims of the
24 Settlement Class Members; (4) Plaintiff and Class Counsel will fairly and adequately protect
25 the interests of the Settlement Class Members; and (5) a class action is superior to other
26 available methods for the fair and efficient adjudication of the controversy.

27 8. The Court appoints as Class Representative, for settlement purposes only,
28 Plaintiff. The Court further preliminarily approves Plaintiff's ability to request a service

1 payment up to \$10,000.00.

2 9. The Court appoints, for settlement purposes only, John G. Yslas, Eugene
3 Zinovyev, John Brown, Emily Borman, Courtney M. Miller, and Gabriella Solé of Wilshire Law
4 Firm, PLC, as Class Counsel. The Court further preliminarily approves Class Counsel's ability
5 to request attorneys' fees of up to one-third (1/3) of the Gross Settlement Amount (i.e.,
6 \$208,333.33), and costs not to exceed \$25,000.00.

7 10. The Court appoints ILYM Group, Inc. as the Settlement Administrator with
8 reasonable administration costs estimated not to exceed \$6,650.00.

9 11. The Court approves, as to form and content the Class Notice, attached to the
10 Settlement Agreement as **Exhibit A**. The Court finds on a preliminary basis that plan for
11 distribution of the Notice to Settlement Class Members satisfies due process, provides the best
12 notice practicable under the circumstances, and shall constitute due and sufficient notice to all
13 persons entitled thereto.

14 12. The Parties are ordered to carry out the Settlement according to the terms of the
15 Settlement Agreement.

16 13. Any Class Member who does not timely and validly request exclusion from the
17 Settlement may object to the Settlement Agreement.

18 14. The Court orders the following Implementation Schedule:

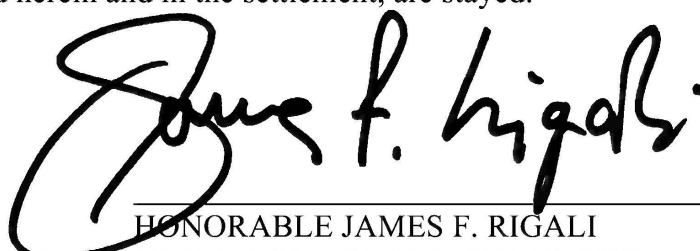
19 EVENT:	DEADLINE:
20 Defendants to provide Class List to the 21 Settlement Administrator	No later than 20 days after the Court grants Preliminary Approval of the Settlement
22 Settlement Administrator to mail the Notice 23 Packets	In no event later than 14 days after receipt of Class Data
24 Class Member Response Deadline (to 25 Object, Opt-Out, and/or Challenge 26 Workweek/Pay Period)	45 days after mailing Notice to Class

EVENT:	DEADLINE:
Deadline to file Motion for Final Approval	16 court days before the calendared Final Approval Hearing
Final Approval Hearing	October 27, 2026, at 8:30 a.m. in Dept. 2 of the above-captioned Court

15. The Court further ORDERS that, pending further order of this Court, all proceedings in this lawsuit, except those contemplated herein and in the settlement, are stayed.

IT IS SO ORDERED.

DATE: 08/14/2026


 HONORABLE JAMES F. RIGALI
 JUDGE OF THE SUPERIOR COURT