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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JANE EG DOE, an individual,

Plaintiff,

vs.

EMPOWER MANAGEMENT, LLC, a
California corporation; L3 OASIS HOTEL, a
business entity of unknown form; KELLY
WOO, an individual; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24STCV22311

CLASS ACTION

[Assigned for all purposes to the
Honorable Elihu M. Berle, Dept. 6]

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

DATE: June 24, 2026

TIME: 10:00 a.m.

DEPT: 6

Complaint Filed: August 30, 2024

Trial Date: None set yet

*[Filed and served concurrently with
Plaintiff's Motion for Preliminary Approval;
and Declarations of Sandra M. Falchetti
and Erika Gonzalez]*

Plaintiff Erika Gonzalez ("Plaintiff")'s Motion for Preliminary Approval of Class and
Representative Action Settlement in Los Angeles County Superior Court, Case No.
24STCV22311 ("the Action") came on regularly for hearing before this Court on June 24, 2026 at
10:00 a.m. Having reviewed Plaintiff's motion, the Declaration of Sandra M. Falchetti and
exhibits thereto, including the Joint Stipulation of Class and Representative Action Settlement

1 and Release (“Stipulation”), and the Declaration of Erika Gonzalez, and good cause appearing
2 therefore, the Court hereby finds and orders as follows:

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4 1. The Court finds on a preliminary basis that the settlement memorialized in the
5 Stipulation appears to be fair, adequate, and reasonable, falls within the range of reasonableness,
6 and therefore meets the requirements for preliminary approval.

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8 2. The Court provisionally certifies for settlement purposes only the following class
9 (“Class”):

10 All current and former non-exempt employees who were employed by Defendants
11 in California from January 1, 2022 through January 23, 2026

12 3. The Court finds, for settlement purposes only, that the Class meets the
13 requirements for certification under Code of Civil Procedure section 382 in that: (1) the Class is
14 so numerous that joinder is impractical; (2) there are questions of law and fact that are common to
15 all Class Members which predominate over individualized issues; (3) Plaintiff’s claims are typical
16 of the claims of the Class; (4) Plaintiff and Plaintiff’s counsel will fairly and adequately protect
17 the interests of the Class; and (5) a class action is superior to other available methods for the fair
18 and efficient adjudication of the controversy.

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20 4. The Court appoints, for settlement purposes only, Plaintiff as the class
21 representative.

22 5. The Court appoints, for settlement purposes only, Sandra M. Falchetti of Falchetti
23 Law Firm, PC as Class Counsel.

24 6. The Court appoints CPT Group, Inc. as the Settlement Administrator.

25 7. The Parties are ordered to carry out the settlement according to the terms of the
26 Stipulation.

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28 8. The Court approves, as to form and content, the Notice of Class Action Settlement

1 (“Class Notice”), attached as Exhibit A to the Stipulation. The Court finds that the notice plan is
2 the best means practicable under the circumstances for providing notice to the Class Members,
3 and when contemplated, shall constitute due and sufficient notice of the class action, proposed
4 settlement, and final approval hearing to all persons entitled to such notice, in full compliance
5 with due process and the notice requirements of Code of Civil Procedure section 877.6.

6 9. Pending the Final Approval hearing, all proceedings in the Action, except those
7 proceedings necessary to implement and complete the Settlement and carry out or enforce the
8 terms and conditions of the Stipulation and this Order, and enter the Final Order and Judgment,
9 are stayed. The five (5) year statute of limitations prescribed by Code of Civil Procedure section
10 583.310, is tolled, pending entry of an order granting final approval of the Settlement or a final
11 order denying approval of the Settlement.
12

13 10. The Court orders the following implementation schedule:
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15 Last day for Defendants to provide the Class List to the Settlement Administrator	____ (15 days after Preliminary Approval is granted)
16 Last day for Settlement Administration to mail Notice Packets to Class Members	____ (14 days after Defendants provide Class List to Settlement Administrator)
17 Last day to dispute dates of employment or Individual Class Wages	____ (____ days after Notice Packets are mailed)
18 Response Deadline	____ (____ days after Notice Packets are mailed)
19 Last day to file and serve the Motion for Final Approval of Class and Representative Action Settlement	____, 2026
20 Final Approval Hearing	____, 2026 at ____ .m. in Department 6

21 11. In the event Final Approval is denied, this Order will be null and void. No class
22 will be certified and all other orders contained herein will be null and void.
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IT IS SO ORDERED.

DATED: _____

HON. ELIHU M. BERLE
JUDGE OF THE SUPERIOR COURT