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8 on behalf of herself and others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF YOLO**

11 ANNA ZAPUSKALOVA, on behalf of
12 herself and others similarly situated,

13 Plaintiff,

14 vs.

15 YOLO COUNTY CHILDREN'S
16 ALLIANCE.; and DOES 1 to 100, inclusive,

17 Defendant.

Case No.: CV2024-1877

CLASS ACTION

*[Assigned for all purposes to Judge Hon.
Timothy L. Fall, Department 6]*

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

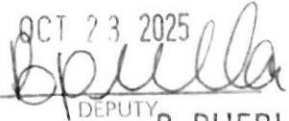
*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class Action
Settlement; Declaration of Eve Howe in Support
Thereof]*

Hearing Information:

Date: October 23, 2025

Time: 9:00 a.m.

Dept.: 6

FILED
YOLO SUPERIOR COURT
OCT 23 2025
BY 
DEPUTY **B. PUEBLA**

1 The Motion for Preliminary Approval of Class Action Settlement came before this Court on
2 October 23, 2025, at 9:00 a.m. or as soon thereafter as the matter could be heard in Department 6 of
3 the Yolo County Superior Court located at 1000 Main Street, Woodland, CA 95695. The Court,
4 having considered the proposed Class Action and PAGA Settlement Agreement and Class Notice
5 entered into by and between Plaintiff Anna Zapuskalova ("Plaintiff") and Yolo County Children's
6 Alliance ("Defendant"), attached as Exhibit 1 to the Declaration of Eve Howe in Support of
7 Plaintiff's Motion for Preliminary Approval of Class Action Settlement, and the Exhibits attached
8 thereto (hereafter collectively, the "Settlement" or "Settlement Agreement"); having considered the
9 Motion for Preliminary Approval of Class Action Settlement filed by the parties; having considered
10 the respective points and authorities and declarations submitted by the parties in support thereof;
11 and good cause appearing, HEREBY ORDERS THE FOLLOWING:

12 The Court grants preliminary approval of the settlement as set forth in the Settlement and
13 finds the terms to be within the range of reasonableness of a settlement that ultimately could be
14 granted approval by the Court at the Final Fairness Hearing. For purposes of the Settlement, the
15 Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-
16 defined community of interest among the Class in questions of law and fact. Therefore, for
17 settlement purposes only, the Court grants conditional certification of the following "Class" defined
18 as follows:

19 All individuals employed by Defendant in California and classified as hourly, non-exempt
20 employees who worked for Defendant during the Class Period.

21 1. The "Class Period" is the period from July 25, 2020 and continuing through the date
22 of preliminary approval of the Settlement (_____), or an earlier date that Defendant
23 selects pursuant to the escalation option (_____).

24 2. For purposes of settlement, the Court further designates named Plaintiff Anna
25 Zapuskalova as Class Representative, and Lavi & Ebrahimian, LLP as Class Counsel.

26 3. The Court appoints Apex Class Action Administration as the Settlement
27 Administrator.

28 4. A final fairness hearing on the question of whether the proposed settlement should

1 be finally approved as fair, reasonable and adequate as to the members of the Class is scheduled in
2 Department 6 of this Court, located at 1000 Main Street, Woodland, CA 95695, on
3 _____, 2026, at _____ a.m./p.m.

4 5. At the final fairness hearing, the Court will consider: (a) whether the settlement
5 should be approved as fair, reasonable, and adequate for the class; (b) whether a judgment granting
6 approval of the settlement should be entered; and (c) whether Plaintiff's application for an award of
7 Class Counsel Fees, Class Counsel Expenses, and Class Representative Service Payment should be
8 granted.

9 6. Counsel for the parties shall file memoranda, declarations, or other statements and
10 materials in support of their request for final approval by no later than 16 court days prior the final
11 fairness hearing.

12 7. Class Counsel shall file a motion for an award of Class Counsel Fees, Class
13 Counsel Expenses, and Class Representative Service Payment by no later than 16 court days prior
14 to the final fairness hearing.

15 8. The Court approves, as to form and content, the Class Notice which is attached to
16 the Settlement as **Exhibit A**.

17 9. No later than fifteen (15) calendar days following the date the Court enters this
18 order, Defendant shall provide the following information to the Settlement Administrator: Class
19 Member identifying information in Defendant's possession including the Class Member's name,
20 last-known mailing address, Social Security number, and number of Class Period Workweeks and
21 PAGA Pay Periods ("Class Data").

22 10. No later than fourteen (14) calendar days after receiving the Class Data, the
23 Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in
24 the Class Data by first-class U.S. Mail.

25 11. Class Members shall have sixty (60) calendar days from the date the Settlement
26 Administrator mails Notice to the Class Members to fax, email, or mail Requests for Exclusion
27 from the Settlement or fax, email, or mail an Objection to the Settlement ("Response Deadline").
28 Class Members to whom Notice Packets are resent after having been returned undeliverable to the

1 Administrator shall have an additional fourteen (14) calendar days beyond the Response Deadline
2 has expired.

3 12. The Court finds that the forms of Class Notice to the Class regarding the pendency
4 of the action and of this settlement, and the methods of giving notice to members of the
5 Settlement Class constitute the best notice practicable under the circumstances and constitute
6 valid, due, and sufficient notice to all members of the Class. They comply fully with the
7 requirements of California Code of Civil Procedure section 382, California Civil Code section
8 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions,
9 and other applicable law.

10 13. The Court further approves the procedures for Class Members to participate in, opt
11 out of, or object to the Settlement, as set forth in the Settlement Agreement and Class Notice.

12 14. Class Members who wish to exclude themselves (opt-out of) the Class Settlement
13 must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not
14 later than 60 days after the Administrator mails the Class Notice (plus an additional 14 days for
15 Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a Class
16 Member or his/her representative that reasonably communicates the Class Member's election to
17 be excluded from the Settlement and includes the Class Member's name, address and email
18 address or telephone number. To be valid, a Request for Exclusion must be timely faxed, emailed,
19 or postmarked by the Response Deadline.

20 15. Participating Class Members may send written objections to the Administrator, by
21 fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire
22 an attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A
23 Participating Class Member who elects to send a written objection to the Administrator must do
24 so not later than 60 days after the Administrator's mailing of the Class Notice (plus an additional
25 14 days for Class Members whose Class Notice was re-mailed).

26 16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings
27 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
28 Order, are stayed.

1 17. Counsel for the parties are hereby authorized to utilize all reasonable procedures in
2 connection with the administration of the settlement which are not materially inconsistent with
3 either this Order or the terms of the Settlement.

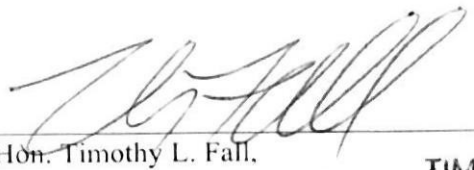
4 18. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Database	15 calendar days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 calendar days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	60 calendar days after the date of mailing of the Class Notice
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses and class representative enhancement.	16 court days prior to the final fairness hearing
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 court days prior to the final fairness hearing
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	

17 19. The Fairness Hearing and related prior deadlines set forth above may, from time to
18 time and without further notice to the Class (except those who have filed timely and valid
19 objections), be continued or adjourned by Order of the Court.

20
21 **IT IS SO ORDERED.**

22
23 Dated: 10/23/25


Hon. Timothy L. Fall,
Judge of the Superior Court

TIMOTHY L. FALL