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Attorneys for Plaintiff VICTORIA VALERIO,
on behalf of herself and others similarly situated

FILED
Superior Court of California
County of Los Angeles
02/09/2026
David W. Slayton, Executive Officer / Clerk of Court
By: _____ A. He _____ Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE**

VICTORIA VALERIO, on behalf of herself
and others similarly situated,

Plaintiff,

vs.

YOUNG LABEL & TAG, INC.; and DOES 1
to 100, inclusive,

Defendants.

Case No.: 24STCV17100

CLASS ACTION

*[Assigned for all purposes to the Hon. Theresa
M. Traber, Dept. 1]*

**~~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 James H. Clark in
Support Thereof]*

Hearing Information:

Date: January 30, 2026

Time: 4:00 p.m.

Dept.: 1

The Motion for Preliminary Approval of a Settlement came before this Court on January 30,
2026, at 4:00 p.m., or as soon thereafter as the matter can be heard Department 1 of the Los Angeles
County Superior Court located at 312 N. Spring St., Los Angeles, California 90012, Plaintiff
VICTORIA VALERIO ("Plaintiff") will move for an order granting preliminary approval of the

1 proposed class action settlement on the terms and conditions set forth in the Class Action and
2 PAGA Settlement Agreement and Class Notice (“Settlement” or “Settlement Agreement”)) between
3 Plaintiff and Defendant YOUNG LABEL & TAG, INC. (“Defendant”) a copy of which is attached
4 to the Declaration of James H. Clark (“Clark Dec.”) as **Exhibit “1”** to the Declaration of James H.
5 Clark in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, and the
6 Exhibits attached thereto (hereafter collectively, the “Settlement” or “Settlement Agreement”);
7 having considered the Motion for Preliminary Approval of Class Action Settlement filed by the
8 parties; having considered the respective points and authorities and declarations submitted by the
9 parties in support thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

17 All current and former hourly, non-exempt employees of Defendant who worked for
18 YOUNG LABEL & TAG, INC. in the State of California at any time during the Class Period.

19 1. The “Class Period” is the period from July 10, 2020, through January 31, 2025.

20 2. For purposes of settlement, the Court further designates named Plaintiff Victoria
21 Valerio as Class Representative, and Joseph Lavi, Esq., Vincent C. Granberry, and James H. Clark,
22 Esq. of Lavi & Ebrahimian, LLP, as Class Counsel.

23 3. The Court appoints Phoenix class Action Administration Solutions as the Settlement
24 Administrator.

25 4. A final fairness hearing on the question of whether the proposed settlement should be
26 finally approved as fair, reasonable and adequate as to the members of the Class is scheduled in
27 Department 1 of this Court, located at 312 N. Spring St., Los Angeles, California 90012, on
28 June 1, 2026, at 10:30 a.m./p.m.

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

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

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

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

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

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

22 11. Class Members shall have forty-five (45) calendar days from the date the
23 Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for
24 Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement ("Response
25 Deadline"). Class Members to whom Notice Packets are resent after having been returned
26 undeliverable to the Administrator shall have an additional fourteen (14) calendar days beyond
27 the Response Deadline has expired.
28

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

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

10 14. Class Members who wish to exclude themselves (opt-out of) the Class Settlement
11 must send the Administrator, by fax, email, or mail, a signed written Request for Exclusion not
12 later than 45 days after the Administrator mails the Class Notice (plus an additional 14 days for
13 Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter from a
14 Class Member or his/her representative that reasonably communicates the Class Member's
15 election to be excluded from the Settlement and includes the Class Member's name, address and
16 email address or telephone number. To be valid, a Request for Exclusion must be timely faxed,
17 emailed, or postmarked by the Response Deadline.

18 15. Participating Class Members may send written objections to the Administrator, by
19 fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire
20 an attorney to appear in Court) to present verbal objections at the Final Approval Hearing. A
21 Participating Class Member who elects to send a written objection to the Administrator must do
22 so not later than 45 days after the Administrator's mailing of the Class Notice (plus an additional
23 14 days for Class Members whose Class Notice was re-mailed).

24 16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings
25 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
26 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	45 calendar days after the date of mailing of the Class Notice <i>(Plus an additional 14 calendar days beyond the 45 calendar day Response Deadline for those Class Members whose Class Notice is Remailed)</i>
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.	June 1, 2026 at 9:00 a.m.

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

21
22 **IT IS SO ORDERED.**

23 Dated: 02/09/2026



Hon. Theresa M. Traber
Judge of the Superior Court