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

ALEXANDER GONZALES, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

WATTS WATER TECHNOLOGIES, INC., a
corporation; WATTS REGULATOR CO., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No: 24CV017389
Assigned to Hon. Jill H. Talley, Dept. 8A

Complaint filed: August 30, 2024
Trial date: Not Set

CLASS & REPRESENTATIVE ACTION

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

PRELIMINARY APPROVAL HEARING

Date: May 29, 2026
Time: 9:00 a.m.
Dept: 8A

1 The Court has before it Plaintiffs Alexander Gonzales, Jose Felix Jr., Enrique Sanchez
2 Puentes, and Sergio Magallanes's ("Plaintiffs" or "Class Representatives") Motion for
3 Preliminary Approval of Class Action Settlement (the "Motion"). Having reviewed the Motion
4 along with the accompanying papers, the Class Action and PAGA Settlement Agreement and
5 Class Notice (which is referred to here as the "Settlement" or "Settlement Agreement"), and
6 good cause appearing, the Court hereby finds and orders as follows:

7 1. The Court finds on a preliminary basis that the Settlement Agreement appears to
8 be fair, just, adequate, and reasonable and therefore meets the requirements for preliminary
9 approval. The Court grants preliminary approval of the Settlement and the Class (as defined
10 below) based upon the terms set forth in the Settlement Agreement between Plaintiffs and
11 Defendants Watts Water Technologies, Inc. and Watts Regulator Co. ("Defendants," and
12 together with Plaintiffs, the "Parties"). A true and correct copy of the Settlement Agreement is
13 attached to the Declaration of Alan Wilcox in Support of Plaintiffs' Motion for Preliminary
14 Approval of Class Action Settlement submitted to the Court as **Exhibit 1**.

15 2. The Settlement falls within the range of reasonableness of a settlement which
16 could ultimately be given final approval by this Court, and appears to be presumptively valid,
17 subject only to any objections that may be raised at the final approval hearing and final approval
18 by this Court. The Court notes that Defendants have agreed to create a common fund of
19 \$295,000.00 (the "Gross Settlement Amount") to cover (a) settlement payments to Class
20 members who do not validly opt out (the "Class Members"); (b) a \$30,000.00 payment for
21 penalties under the Private Attorneys General Act ("PAGA"), with 75% of which (\$22,500.00)
22 being paid to the LWDA (the "LWDA PAGA Payment") and 25% (\$7,500.00) being paid to
23 eligible "Individual PAGA Payment" (as defined in the Settlement Agreement); (c) an
24 enhancement award of up to \$10,000.00 for each named Plaintiff (\$40,000.00 total) (the "Class
25 Representative Service Payment"); (d) Class Counsel's attorneys' fees not to exceed 33 1/3%
26 of the Gross Settlement Amount (\$98,333.33) (the "Class Counsel Fees Payment"), and up to
27 \$25,000.00 in costs for actual litigation expenses incurred by Class Counsel (the "Class Counsel
28 Litigation Expenses Payment"); and (e) a payment to Apex Class Action Administration (the

1 “Administrator”) of up to \$4,490.00 (the “Administration Expenses Payment”).

2 3. The Court preliminarily finds that the terms of the Settlement appear to be within
3 the range of possible approval, pursuant to California Code of Civil Procedure § 382 and
4 applicable law. The Court finds on a preliminary basis that: (1) the Gross Settlement Amount is
5 fair, just, reasonable, and adequate to the Class when balanced against the probable outcome of
6 further litigation relating to class certification, liability and damages issues, and potential
7 appeals; (2) significant informal discovery, investigation, research, and litigation have been
8 conducted such that counsel for the Parties at this time are able to reasonably evaluate their
9 respective positions; (3) settlement at this time will avoid substantial costs, delay, and risks that
10 would be presented by the further prosecution of the litigation; and (4) the proposed Settlement
11 has been reached as the result of intensive, serious, and non-collusive negotiations between the
12 Parties with the assistance of a well-respected class action mediator. Accordingly, the Court
13 preliminarily finds that the Settlement Agreement was entered into in good faith.

14 4. A final fairness hearing on the question of whether the proposed Settlement, Class
15 Counsel Fees Payment and Class Counsel Litigation Expenses Payment, the PAGA Penalties
16 Payment for its share of the settlement of claims for penalties under the PAGA, and the Class
17 Representative Service Payments should be finally approved as fair, just, reasonable and
18 adequate as to the Class is hereby set in accordance with the implementation schedule set forth
19 below.

20 5. For settlement purposes, the Court provisionally certifies the Class defined as all
21 persons currently and previously employed by Defendants in California and classified as an
22 hourly-paid or non-exempt employee who worked for Defendants during the Class Period (each
23 “Class Member(s)” collectively the “Class”). The Class Period is the period from August 30,
24 2020, to February 20, 2026 (the “Class Period”).

25 6. The Court finds, for settlement purposes only, that the Class meets the
26 requirements for certification under California Code of Civil Procedure § 382 in that: (1) the
27 Class Members are so numerous that joinder is impractical; (2) there are questions of law and
28 fact that are common, or of general interest, to all Class Members, which predominate over

individual issues; (3) Plaintiffs' claims are typical of the claims of the Class Members; (4) Plaintiffs and Class Counsel will fairly and adequately protect the interests of the Class Members; and (5) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

7. The Court appoints Plaintiffs as Class Representatives, for settlement purposes only. The Court further preliminarily approves Plaintiffs' ability to request the Class Representative Service Payment.

8. The Court appoints, for settlement purposes only, Benjamin H. Haber, Daniel J. Kramer, Chase M. Stern, Alan Wilcox, and Conor Gomez of Wilshire Law Firm, PLC as "Class Counsel". The Court further preliminarily approves Class Counsel's ability to request the Class Counsel Fees Payment and Class Counsel Litigation Expenses Payment.

9. The Court appoints Apex Class Action Administration. as the Administrator with the Administrator Costs estimated not to exceed \$4,490.00.

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

11. The Parties are ordered to carry out the Settlement according to the terms of the Settlement Agreement.

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

13. The Court orders the following implementation schedule:

Defendants to provide Class List to the Settlement Administrator	Within 21 business days after the Court grants Preliminary Approval of the Settlement
Settlement Administrator to mail the Class	Within 14 days after receipt of the Class List

1	Notice	from the Defendants
2		45 days after Class Notice is mailed out by
3		the Settlement Administrator
4	Response Deadline	14 days additional days for any notices that
5		were resent
6	Deadline to file Motion for Final Approval,	16 court days before hearing on Motion for
7	Request for Attorneys' Fees and Costs, and	Final Approval
8	Service Award to Plaintiffs	
9		October 22, 2026 at 8:30 a.m., or first
10		available date thereafter, in Department 8A.
11	Final Approval Hearing	The hearing may be continued to another
12		date without further notice to the Class
13		Members.

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

16 15. _____
17 _____
18 _____
19 _____.

20 **IT IS SO ORDERED.**

21
22 DATE:

23 _____
24 Hon. Jill H. Talley
25 Sacramento County Superior Court
26
27
28