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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF SAN DIEGO**

15 BRIAN LOZA, as an individual and on
16 behalf of all others similarly situated,

17 Plaintiff,

18 vs.

19 HIDDEN VALLEY INVESTMENTS,
20 INC., dba QUALITY CHEVROLET and
21 QUALITY CHEVROLET
COMMERCIAL TRUCK, a California
Corporation; and DOES 1 through 100,

22 Defendants.
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Case No.: 24CU009062C

*[Case Assigned for all purposes to the Hon.
Katherine A. Bacal; Dept. C-63]*

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Date: November 14, 2025

Time: 1:30 p.m.

Dept.: C-63

Action Filed: September 3, 2024

Trial Date: None Set

1 The Motion of Plaintiff Brian Loza (“Plaintiff”) for Preliminary Approval of Class and
2 PAGA Action Settlement came on regularly for hearing before this Court on November 14, 2025,
3 at 1:30 p.m. This Court, having considered the proposed Class Action and PAGA Settlement
4 Agreement (“Settlement Agreement”) attached as Exhibit A to the Declaration of Andrew J.
5 Rowbotham filed concurrently herein; having considered Plaintiff’s Motion for Preliminary
6 Approval of Class and PAGA Action Settlement, Memorandum of Points and Authorities in
7 support thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY
8 ORDERS THE FOLLOWING:

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

16 All current and former hourly-paid and/or non-exempt employees
17 as well as those individuals who fall under the salesperson
18 exemptions, who worked for Defendants Hidden Valley
19 Investments, Inc. dba Quality Chevrolet and L&L Investments, Inc.
20 dba Quality Chevrolet (“Defendants”) in the State of California at
any time from September 3, 2023, through September 26, 2025 (the
“Class Period”).

21 2. The Settlement Agreement provides for a Gross Settlement Amount of
22 \$270,000.00, which includes an attorneys’ fees award not to exceed 35% of that amount
23 (\$94,500.00), litigation expenses not to exceed \$30,000.00, a proposed Class Representative
24 Enhancement Payment to Plaintiff not to exceed \$10,000.00, PAGA civil penalties totaling
25 \$20,000.00 (35% of which, or \$7,000.00, will be paid to PAGA Aggrieved Employees), and
26 settlement administration costs not to exceed \$6,990.00. The Court will not approve the amount
27 of attorneys’ fees and costs, Class Representative Enhancement Payment, settlement
28 administration costs, or PAGA civil penalties until the Final Approval Hearing.

1 3. For purposes of the Settlement, the Court designates Plaintiff Brian Loza as Class
2 Representative, and designates Paul K. Haines, Fletcher W. Schmidt, Andrew J. Rowbotham, and
3 Aden M. Khachadoorian of Haines Law Group, APC as Class Counsel.

4 4. The Court designates Apex Class Action Administration as the third-party
5 Settlement Administrator for mailing notices.

6 5. The Court approves, as to form and content, the Notice of Class Action Settlement
7 (“Class Notice”) which also includes the Notice of Settlement Payment (collectively, the “Notice
8 Packet”), attached as Exhibit B to the Rowbotham Declaration filed in support of Plaintiff’s
9 Motion.

10 6. The Court finds that the form of notice to the Settlement Class regarding the
11 pendency of the action and of the Settlement, and the methods of giving notice to members of the
12 Settlement Class, constitute the best notice practicable under the circumstances, and constitute
13 valid, due, and sufficient notice to all of the Settlement Class members. The form and method of
14 giving notice complies fully with the requirements of California Code of Civil Procedure § 382,
15 California Civil Code § 1781, California Rules of Court 3.766 and 3.769, the California and
16 United States Constitutions, and other applicable law.

17 7. The Court further approves the procedures for the Settlement Class members to
18 opt out of or object to the Settlement, as set forth in the Class Notice.

19 8. The procedures and requirements for filing objections in connection with the Final
20 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
21 presentation of any Settlement Class member’s objection to the Settlement in accordance with the
22 due process rights of all members of the Settlement Class.

23 9. The Court directs the Settlement Administrator to mail the Notice Packet to
24 Settlement Class members and to carry out all duties as required under the Settlement.

25 10. The Class Notice shall provide at least forty-five (45) calendar days’ notice for
26 members of the Settlement Class to opt out of, or object to the Settlement. Any Request for
27 Exclusion or Objection shall be submitted directly to the Settlement Administrator and not filed
28 with the Court. Upon receipt of any Requests for Exclusion or Objections, the Settlement

1 Administrator shall forward copies of all Requests for Exclusion and Objections to counsel for
2 all parties. The Settlement Administrator shall file a declaration concurrently with the filing of
3 the Motion for Final Approval of Class Action Settlement which authenticates a copy of every
4 Request for Exclusion and Objection received by the Settlement Administrator. The Settlement
5 Administrator shall give notice to any objecting Settlement Class member of any continuance of
6 the hearing on Plaintiff's Motion for Final Approval of Class and PAGA Action Settlement.

7 11. The Final Approval Hearing to determine whether the Settlement is fair,
8 reasonable, and adequate is scheduled for April 6, 2026, at 1:30 p.m. in Department C-63 of this
9 Court, located at 330 W. Broadway, San Diego, CA 92101.

10 12. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
11 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
12 a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's
13 application for reasonable attorneys' fees, reimbursement of litigation expenses, Class
14 Representative Enhancement Payment, settlement administration costs, and payment to the Labor
15 & Workforce Development Agency ("LWDA") for penalties under the Labor Code Private
16 Attorneys General Act should be granted.

17 13. Counsel for the parties shall file memoranda, declarations, or other statements and
18 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
19 expenses, Plaintiff's Class Representative Enhancement Payment, payment to the LWDA, and
20 settlement administration costs, prior to the Final Approval Hearing according to the time limits
21 set by the Code of Civil Procedure and the California Rules of Court.

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1 14. An implementation schedule is below (assuming preliminary approval is granted
2 on November 14, 2025):

3 Event	4 Date
5 Defendants to provide Class Member information to the 6 Settlement Administrator (30 Calendar days after 7 preliminary approval):	8 December 15, 2025
9 Settlement Administrator to mail the Notice Packet to 10 Settlement Class Members (10 business days after receiving 11 Class Member information):	12 December 30, 2025
13 Deadline for Settlement Class Members to request 14 exclusion, object, or submit a dispute (45 calendar days 15 after mailing):	16 February 13, 2026
17 Deadline for Plaintiff to file Motion for Final Approval of 18 Class Action Settlement (16 court days before Final 19 Approval Hearing):	20 March 18, 2026
21 Final Approval Hearing:	22 April 10, 2026, at 1:30 p.m.

23 15. Pending the Final Approval Hearing, all proceedings in this action, other than
24 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this
25 Order, are stayed.

26 16. Counsel for the parties are hereby authorized to utilize all reasonable procedures
27 in connection with the administration of the Settlement which are not materially inconsistent with
28 either this Order or the terms of the Settlement.

IT IS SO ORDERED.

Dated: _____, 2025

Hon. Katherine A. Bacal
Judge of the Superior Court