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9 *Attorneys for Plaintiffs and the Putative Class*

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

BENNY ADAMS, *et al.*,

Plaintiff,

v.

CROSSING, INC, *et al.*,

Defendants.

CLASS ACTION

Case No: 24STCV27904

Assigned to Judge Samantha P. Jessner
Dept. 7

**[PROPOSED] ORDER GRANTING
CONDITIONAL CLASS CERTIFICATION
AND PRELIMINARY APPROVAL OF CLASS
ACTION AND PRIVATE ATTORNEY
GENERAL ACT SETTLEMENT**

Initial Complaint Filed: October 24, 2024

Initial Trial Date: None Set

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[PROPOSED] ORDER

On _____, at _____, this case came for hearing before the Honorable Samantha P. Jessner in Department 7 of the Superior Court, County of Los Angeles, located at 312 North Spring Street, Los Angeles, California 90012, for Plaintiffs Benny Adams and Kelsey Ceco's ("Plaintiffs") unopposed Motion for Conditional Class Certification and Preliminary Approval of Class Action and Private Attorney General Act Settlement ("Motion").

The Court, having fully reviewed the unopposed Motion, the supporting Memorandum of Points and Authorities, the Declarations of Rolando J. Gutierrez, Albro L. Lundy III, Benny Adams, Kelsey Ceco, Richard Kim, and Sarina Saluja, filed in support thereof, the Class Action and PAGA Settlement Agreement ("Settlement Agreement"), and the proposed Notice of Class Action and PAGA Settlement ("Class Notice"), and having carefully analyzed the Settlement Agreement and the Class Notice, HEREBY MAKES THE FOLLOWING ORDERS:

1. The Court grants preliminary approval of the Settlement and the Settlement Class based upon the terms set forth in the Settlement Agreement, attached to the Declaration of Rolando J. Gutierrez, Esq. as Exhibit 1, along with the Class Notice attached to the Settlement Agreement as Exhibit A, and both incorporated herein by this reference, and made a part of this Order. At this stage in the proceedings, subject only to any objections that may be raised at the final fairness hearing and final approval by this Court, the Court finds the Settlement to be fair, adequate, and reasonable, and in the best interests of the Settlement Class. The Court further finds the respective requests for fees, reimbursement of litigation expenses, the administrator's expense payment, and service award are fair and reasonable, subject only to any objections that may be raised at the final fairness hearing and final approval by this Court.

2. For settlement purposes only, the Court grants conditional certification of the following "Settlement Class," defined as:

All current and former non-exempt employees who work or worked for Crossing, Inc., Crossing Media, Inc., Crossing Cards, Vernacular English, Inc., and/or Siliang Di, during the time-period of October 24, 2020, to February 24, 2026.

The Class Period is from October 24, 2020, to February 24, 2026.

1 3. The Settlement Class also includes the following “Subclass,” defined as:

2 All current and former non-exempt employees within the Class who were
3 misclassified as “independent contractors” and/or as “1099 employees.”

4 4. The Court confirms “Aggrieved Employee” to mean:

5 All current or former non-exempt employees who worked for Crossing, Inc., Crossing
6 Media, Inc., Crossing Cards, Vernacular English, Inc., and/or Siliang Di, from August
7 20, 2023, to February 24, 2026.

7 The PAGA Period is from August 20, 2023, to February 24, 2026.

8 5. The Court confirms Rolando J. Gutierrez, Esq. and Albro L. Lundy III, Esq., of Baker,
9 Burton & Lundy, P.C., and Richard Kim, Esq., of the Law Office of Richard Kim, P.C., as Class
10 Counsel for settlement purposes.

11 6. The Court hereby appoints Plaintiffs Benny Adams and Kelsey Ceco as Class
12 Representatives.

13 7. The Court confirms CPT Group, Inc. as the Claims Administrator.

14 8. The Court finds that the form of Class Notice to the Settlement Class regarding the
15 pendency of the action and of the Settlement, and the methods of giving notice to members of the
16 Settlement Class, constitute the best notice practicable under the circumstances and valid, due, and
17 sufficient notice to the Settlement Class. The form and method of giving notice complies with the
18 requirements of California Code of Civil Procedure § 382, California Civil Code § 1781, California
19 Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable
20 law.

21 9. The Court approves the procedures for Settlement Class members to opt out of or
22 object to the class-based portion of the Settlement, as set forth in the Class Notice and the Settlement
23 Agreement. The Class Notice shall provide at least 45 calendar days’ notice for members of the
24 Settlement Class to submit disputes, opt out of, or object to the class-based portion of the Settlement,
25 plus an additional 14 days for Class Members whose Class Notice is re-mailed.

26 10. The Court finds that the procedures and requirements for filing objections to the class-
27 based portion of the Settlement in connection with the Final Fairness Hearing are intended to ensure
28 the efficient administration of justice and the orderly presentation of any Settlement Class Member’s

objection to the class-based portion of the Settlement, in accordance with the due process rights of all Settlement Class Members.

11. The Court directs the Claims Administrator to mail the Class Notice to the members of the Settlement Class in accordance with the terms of the Settlement Agreement.

12. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 7 of this Court, located at 312 North Spring Street, Los Angeles, California 90012, on _____ at _____.

13. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs' application for service awards, claims administration costs, the Labor and Workforce Development Agency's ("LWDA") share of PAGA penalties, and Class Counsel's attorneys' fees and costs should be granted.

14. Class Counsel shall file memoranda, declarations, or other statements and materials in support of their request for final approval, including Plaintiffs' application for service awards, claims administration costs, the LWDA's share of PAGA penalties, and Class Counsel's attorneys' fees and costs, no later than _____.

15. The Court orders the following administration schedule for further proceedings:

Event	Timing
Defendants to deliver Class Data to the Administrator.	Within 15 days after Preliminary Approval.
Class Notice mailed to Class Members.	15 days after receipt of the Class Data (i.e., 30 days from Preliminary Approval), but no later than 14 days after receiving the Class Data.
Deadline to opt out of, object to, or challenge workweek/PAGA pay-period count.	45 days after the Class Notice is mailed, plus an additional 14 days for re-mailed Class Notices (i.e., 74 days after Preliminary Approval) (the "Response Deadline").

1 2 3	Plaintiffs file Motion for Final Approval, Motion for Attorneys' Fees and Reimbursement of Costs, and Motion for Service Awards.	25 days after the Response Deadline (i.e., 99 days after Preliminary Approval), or _____.
4 5 6 7 8	Final Approval Hearing.	16 court days after the filing of the Motion for Final Approval, Motion for Attorneys' Fees and Reimbursement of Costs, and Motion for Service Awards, or _____, at _____.

10 16. Pending the Final Fairness Hearing, all proceedings in this action, other than
11 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this
12 Order, are stayed, including the five-year deadline to bring this matter to trial under section 583.310
13 of the California Code of Civil Procedure.

14 17. Counsel for the Parties are hereby authorized to utilize all reasonable procedures in
15 connection with the administration of the Settlement that are not materially inconsistent with either
16 this Order or the terms of the Settlement.

17
18 IT IS SO ORDERED.

19
20 DATED: _____

21 By: _____
22 HONORABLE SAMANTHA P. JESSNER
23 Judge of the Superior Court
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1 **PROOF OF SERVICE**

2 **RE: *Benny Adams v. Crossing, Inc., et al.***
3 **Case No: 24STCV27904**
LWDA Case No: LWDA-CM- 1058105 -24

4 I am employed in the State of California, County of Los Angeles. I am over the age of 18 and
5 not a party to this action. My business address is 515 Pier Avenue, Hermosa Beach, CA 90254.

6 On **July 2, 2026**, I served true and correct copies of the following document(s) described as:

7 **[PROPOSED] ORDER GRANTING CONDITIONAL CLASS CERTIFICATION AND**
8 **PRELIMINARY APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEY GENERAL**
9 **ACT SETTLEMENT**

10 on the interested parties as follows:

11 Labor and Workforce Development Agency
12 800 Capital Mall, Suite 500
13 Sacramento, California 95814

14 ☒ **BY ELECTRONIC SUBMISSION:** Complying with CAL. LAB. CODE §§ 2699(l)(4) and
15 2699.3, I caused true and correct copies of the documents to be served on the Labor and
16 Workforce Development Agency through its online platform at <https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
18 and correct.

19 Executed on **July 2, 2026** at Hermosa Beach, California.

20 Kally Imaicela-Lopez
21 Type or Print Name

22 
23 Signature

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2 **RE: Benny Adams v. Crossing, Inc., et al.**
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7 **PRELIMINARY APPROVAL OF CLASS ACTION AND PRIVATE ATTORNEY GENERAL**
8 **ACT SETTLEMENT**

on the interested parties as follows:

9 Sarina Saluja, Esq.
10 ssaluja@loeb.com
11 **LOEB & LOEB LLP**
10100 Santa Monica Blvd, Suite 2200
Los Angeles, CA 90067

12 *Counsel for Defendants*
13 **CROSSING, INC.**
SILIANG DI

Richard Kim, Esq.
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Buena Park, CA 90620-4929
cc: Nathan Seong
nseong@richkimlaw.com

*Co-Counsel for Plaintiff and the Putative
Class*

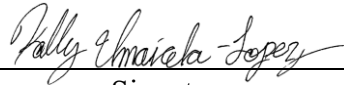
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15 [] **VIA MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the envelope(s) for
16 mailing in the ordinary course of business at Hermosa Beach, California. I am “readily
17 familiar” with this firm’s practice of collection and processing correspondence for mailing.
Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day
18 in the ordinary course of business with postage thereon fully prepaid at Hermosa Beach,
California.

19 [✓] **VIA CASE ANYWHERE:** Complying with California Rule of Court 2.251 and Code of Civil
20 Procedure § 1010.6, *et. seq.*, and in compliance with the Court’s Order Authorizing Electronic
Service, I caused true and correct copies of the documents to be served through Case Anywhere
21 at www.caseanywhere.com to the email address(es) of the person(s) identified above.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
true and correct.

23 Executed on **July 2, 2026** at Hermosa Beach, California.

24
25 Kally Imaicela-Lopez
Type or Print Name

26
27 
Signature