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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

RICARDO BETANCOURTH and ALBERTO
NAVAS, as individuals and on behalf of all
others similarly situated and as aggrieved
employees and Private Attorney General,

Plaintiffs,

vs.

ECOLOGY AUTO PARTS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV27258

*[Case assigned for all purposes to the Hon.
Laura A. Seigle, Dept. SSC-17]*

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

Date: May 22, 2026
Time: 9:00 a.m.
Dept.: SSC-17

Complaint Filed: October 17, 2024
Trial Date: None Set

1 The Motion of Plaintiffs Ricardo Betancourth and Alberto Navas (“Plaintiffs”) for
2 Preliminary Approval of Class Action Settlement came on regularly for hearing before this Court
3 on May 22, 2026, at 9:00 a.m. This Court, having considered the proposed Stipulation of
4 Settlement (the “Settlement”) attached to the Declaration of Sean M. Blakely filed concurrently
5 herein; having considered Plaintiffs’ Motion for Preliminary Approval of Class Action
6 Settlement, Memorandum of Points and Authorities in support thereof, and supporting
7 declarations filed therewith; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

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

15 All current and former non-exempt employees employed by Defendant
16 Ecology Auto Parts, Inc. as Drivers in California from October 17, 2020,
17 through January 15, 2026 (the “Drivers Class Period”), and all other current
18 and former non-exempt employees employed by Defendant Ecology Auto
19 Parts, Inc. in California from January 1, 2023 through January 15, 2026 (the
20 “Non-Drivers Class Period”).

21 2. For purposes of the Settlement, the Court preliminarily designates Plaintiffs
22 Ricardo Betancourth and Alberto Navas as Class Representatives, and preliminarily designates
23 Paul K. Haines, Sean M. Blakely, and Kristoper N. Tayyeb of Haines Law Group, APC, and
24 Heather Davis and Amir Nayebedadash of Protection Law Group, LLP as Class Counsel.

25 3. The Court designates ILYM Group, Inc. as the third-party Settlement
26 Administrator for mailing notices.

27 4. The Court approves, as to form and content, the Notice of Pendency of Class
28 Action and Proposed Settlement (“Class Notice”) and Notice of Estimated Settlement Award
(collectively, the “Notice Packet”), attached as Exhibits 1 and 2, respectively, to the Settlement.

1 5. The Court finds that the form of notice to the Settlement Class regarding the
2 pendency of the action and of the 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 of the Settlement Class members. The form and method of
5 giving notice complies fully with the requirements of California Code of Civil Procedure section
6 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California
7 and United States Constitutions, and other applicable law.

8 6. The Court further approves the procedures for the Settlement Class members to
9 opt out of or object to the Settlement, as set forth in the Class Notice.

10 7. The procedures and requirements for filing objections in connection with the Final
11 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
12 presentation of any Settlement Class member's objection to the Settlement in accordance with the
13 due process rights of all members of the Settlement Class.

14 8. The Court directs the Settlement Administrator to mail the Notice Packet to the
15 members of the Settlement Class in accordance with the terms of the Settlement.

16 9. The Class Notice shall provide at least forty-five (45) calendar days' notice for
17 Settlement Class members to opt out of, or object to, the Settlement.

18 10. The Final Approval Hearing on the question of whether the Settlement should be
19 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-17 of this
20 Court, located at 312 North Spring Street, Los Angeles, California 90012 on
21 _____, 2026, at _____ a.m. / p.m.

22 11. At the Final Approval Hearing, the Court will consider: (a) whether the Settlement
23 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether
24 a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs'
25 application for reasonable attorneys' fees, reimbursement of litigation expenses, service awards
26 to Plaintiffs, settlement administration costs, and payment to the Labor & Workforce
27 Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General
28 Act should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiffs' service awards, payment to the LWDA, and settlement administration costs, prior to the Final Approval Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to the Settlement Administrator no later than [15 business days after preliminary approval]:	June 15, 2026
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [15 business days after receiving Class Data]:	July 6, 2026
Deadline for Settlement Class members to request exclusion from, submit a dispute, or object to, the Settlement [45 calendar days after mailing]:	August 20, 2026
Deadline for Plaintiffs to file his Motion for Final Approval of Class Action Settlement:	September 17, 2026
Final Approval Hearing:	_____, 2026

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

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

IT IS SO ORDERED.

Dated: _____, 2026

Hon. Laura A. Seigle
Judge of the Superior Court