SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

ELENA MARTHA VARELA, on behalf of herself and all others similarly situated, and on behalf of the general public, Plaintiff, vs. FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY, INC., a California Corporation, and DOES 1 to 10, inclusive, Defendants.	CASE NO.: 30-2025-01462276-CU-OE-CXC **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

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

IT IS HEREBY ORDERED:

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiff Elena Martha Varela as Class Representative;
3. The Court grants preliminary approval of Otkupman Law Firm, A Law Corporation, as Class Counsel;
4. The Court grants preliminary approval of Settlement of claims as set forth in the Settlement Agreement;
5. The Court approves the proposed Class Notice and Exclusion Form;
6. The Court grants preliminary approval of the Gross Settlement Amount of $500,000.00;
7. The Court grants preliminary approval of ILYM Group, Inc. ("ILYM") as Settlement Administrator and payment of service in an amount up to $7,850.00;
8. The Court grants preliminary approval of a Class Representative Enhancement Payment to Plaintiff Elena Martha Varela in an amount up to $10,000.00;
9. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of $166,650.00, and costs up to $25,000.00;
10. The Court grants preliminary approval of the PAGA Payment in the amount of $40,000.00. 65% of this amount ($26,000.00) will be paid to the LWDA and 35% of this amount ($14,000.00) will be paid to the Aggrieved Employees on a pro rata basis.
11. The Court grants the schedule for implementation of the terms of the Settlement Agreement and the Court sets a hearing on final approval on _____ at _____ a.m./p.m. in Department CX105.

DATED:_____ _____

HON. JUDGE OF THE SUPERIOR COURT