

1 Joseph Lavi, Esq. (SBN 209776)
2 Vincent C. Granberry, Esq. (SBN 276483)
3 Malcolm E. Clayton, Esq. (SBN 340680)
4 Paolo PolICASTRO, Esq. (SBN 359731)
5 **LAVI & EBRAHIMIAN, LLP**
6 8889 W Olympic Boulevard, Suite 200
7 Beverly Hills, California 90211
8 Telephone: (310) 432-0000
9 Facsimile: (310) 432-0001
10 Email: jlavi@lelawfirm.com
11 vgranberry@lelawfirm.com
12 mclayton@lelawfirm.com
13 ppolicastro@lelawfirm.com

14 Attorneys for Plaintiff TASHAUNA RENEE SIMON,
15 on behalf of herself and others similarly situated.

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

18 TASHAUNA RENEE SIMON, on behalf of
19 herself and others similarly situated,

20 Plaintiff,

21 vs.

22 DEEP SEA OIL, INC.; and DOES 1 to 100,
23 inclusive,

24 Defendants.

FILED
Superior Court of California
County of Los Angeles
02/18/2026
David W. Slayton, Executive Officer / Clerk of Court
By: A. Morales Deputy

Case No.: 24STCV32698

CLASS AND PAGA ACTION

*[Assigned for All purposes to the
Hon. Samantha P. Jessner, Dept. 7]*

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

*[Filed concurrently with Notice of Motion and
Motion for Preliminary Approval of Class
Action Settlement; Declarations in Support]*

Hearing Information:
Date: February 18, 2026
Time: 10:00 a.m.
Dept.: 7

1 The Motion for Preliminary Approval of a Settlement came before this Court on February 18,
2 2026, at 10:00 a.m., in Department 7 of the Los Angeles County Superior Court located at 312 North
3 Spring Street, Los Angeles, CA 90012. The Court, having considered the proposed Class Action and
4 PAGA Settlement Agreement and Class Notice entered into by and between Plaintiff Tashauna Renee
5 Simon (“Plaintiff”) and Defendant Deep Sea Oil, Inc. (“Defendant”) attached as **Exhibit 1** to the
6 Declaration of Paolo Policastro in Support of Plaintiff’s Motion for Preliminary Approval of Class
7 Action Settlement, and the Exhibits attached thereto (hereafter collectively, the “Settlement” or
8 “Settlement Agreement”); having considered the Motion for Preliminary Approval of Class Action
9 Settlement filed by the parties; having considered the memorandum of points and authorities and
10 declarations submitted by the parties in support thereof; and good cause appearing, HEREBY
11 ORDERS THE FOLLOWING:

12 1. The Court grants preliminary approval of the settlement as set forth in the Settlement
13 Agreement and finds the terms to be within the range of reasonableness of a settlement that ultimately
14 could be granted approval by the Court at the Final Fairness Hearing. For purposes of the Settlement
15 only, the Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently
16 well-defined community of interest among the Class as to questions of law and fact. Therefore, for
17 settlement purposes only, the Court grants conditional certification of the following “Class” defined
18 as follows:

19 All person employed by Defendant in California and classified as an hourly, non-exempt
20 employee who worked for Defendant during the Class Period. The “Class Period” is the period from
21 December 11, 2020, through June 9, 2025.

22 2. For purposes of the Settlement only, the Court further designates named Plaintiff
23 Tashauna Renee Simon as Class Representative, and Joseph Lavi, Esq., Vincent C. Granberry, Esq.,
24 Malcolm E. Clayton, Esq., and Paolo Policastro, Esq., of Lavi & Ebrahimian, LLP as Class Counsel.

25 3. The Court appoints Apex Class Action LLC as the Settlement Administrator.

26 4. A final fairness hearing on the question of whether the proposed Settlement should be
27 finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in
28

Department 7 of this Court, located at 312 North Spring Street, Los Angeles, CA 90012 on
June 29, 2026, ^{10:00 a.m.}~~2025~~, at _____ a.m./~~p.m.~~

5. At the final fairness hearing, the Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting approval of the Settlement should be entered; and (c) whether Plaintiff's application for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment should be granted.

6. Counsel for the Parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval by no later than 16 court days prior to the final fairness hearing.

7. Class Counsel shall file a motion for an award of Class Counsel Fees Payment, Class Counsel Litigation Expenses Payment, and Class Representative Service Payment no later than 16 court days prior to the final fairness hearing.

8. The Court approves, as to form and content, the Class Notice which is appended to the Settlement Agreement.

9. No later than fifteen (15) days following the date the Court enters this order, Defendants shall provide the following information to the Settlement Administrator: Class Member identifying information in Defendants' possession, including the Class Member's name, last-known mailing address, Social Security number, number of Class Period Workweeks, and PAGA Pay Periods. ("Class Data").

10. Within fourteen (14) calendar days after receiving the Class Data, the Settlement Administrator shall disseminate the Class Notice to all the Class Members identified in the Class Data by first-class U.S. Mail.

11. Class Members shall have forty-five (45) calendar days from the date the Settlement Administrator mails Notice to the Class Members to fax, email, or mail Requests for Exclusion from the Settlement or fax, email, or mail an Objection to the Settlement ("Response Deadline"). Class Members to whom Notice Packets are resent after having been returned undeliverable to the

1 Administrator shall have an additional fourteen (14) calendar days after the Response Deadline has
2 expired.

3 12. The Court finds that the forms of Class Notice to the Class regarding the pendency
4 of the action and of this Settlement, and the methods of giving notice to members of the Settlement
5 Class constitute the best notice practicable under the circumstances and constitute valid, due, and
6 sufficient notice to all members of the Class. They comply fully with the requirements of California
7 Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court
8 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

9 13. The Court further approves the procedures for Class Members to participate in, opt
10 out of, or object to the Settlement, as set forth in the Settlement Agreement and Class Notice.

11 14. Class Members who wish to exclude themselves from (opt-out of) the Class
12 Settlement must send the Administrator, by fax, email, or mail, a signed written Request for
13 Exclusion not later than 45 days after the Administrator mails the Class Notice (plus an additional
14 14 days for Class Members whose Class Notice is re-mailed). A Request for Exclusion is a letter
15 from a Class Member or the Class Member's representative that reasonably communicates the Class
16 Member's election to be excluded from the Settlement and includes the Class Member's name,
17 address, and email address or telephone number. To be valid, a Request for Exclusion must be
18 timely faxed, emailed, or postmarked by the Response Deadline.

19 15. Participating Class Members may send written objections to the Administrator by
20 fax, email, or mail. In the alternative, Participating Class Members may appear in Court (or hire an
21 attorney to appear in Court on their behalf) to present verbal objections at the Final Approval
22 Hearing. A Participating Class Member who elects to send a written objection to the Administrator
23 must do so not later than 45 days after the Administrator's mailing of the Class Notice (plus an
24 additional 14 days for Class Members whose Class Notice was re-mailed).

25 16. Pending the Fairness Hearing, all proceedings in this action, other than proceedings
26 necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this
27 Order, are stayed.

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

4 18. The Court orders the following Implementation Schedule for further proceedings:

Event	Timing
Class Data: Last day for Defendant to provide the Settlement Administrator the Class Database	15 days after the Court's entry of this Order
Notice Date: last day for Administrator to mail Class Notice to Class Members.	14 days after receipt of the Class Data
Response Deadline: (i) last day for Settlement Class Members to submit Requests for Exclusion; (ii) last day for class members to submit Objections	45 calendar days after the date of mailing of the Class Notice
Last day for class counsel to file motion for award of attorneys' fees, reimbursement of litigation expenses, and class representative enhancement.	16 Court days prior to the final fairness hearing
Last day for parties to file motion and supporting documents for final approval of class action settlement.	16 Court days prior to the final fairness hearing
Last day for the Parties to respond to Objections	5 court days prior to the final fairness hearing
Hearing on final approval of class action settlement.	Approximately 150 days after the Court grants preliminary approval of the Settlement

18 19. The Fairness Hearing and related prior deadlines set forth above may, from time to
19 time and without further notice to the Class (except to those who have filed timely and valid
20 objections), be continued or adjourned by Order of the Court. The Settlement Administrator will
21 provide notice to any objecting Class Member if there is a change in the date and/or time of the Final
22 Approval Hearing.

23 **IT IS SO ORDERED.**

24
25 Dated: 02/18/2026



Samantha Jessner / Judge

Hon. Samantha P. Jessner
Judge of the Superior Court