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Attorneys for Maybelyn Ugale, on behalf
of herself and all others similarly situated

(Additional Counsel listed on next page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

MAYBELYN UGALE on behalf of herself and
all others similarly situated,

Plaintiff,

vs.

STANFORD HEALTH CARE, a California
corporation; THE HOSPITAL COMMITTEE for
the LIVERMORE-PLEASANTON AREAS
d/b/a STANFORD HEALTH CARE-
VALLEYCARE, a California corporation and
DOES 1 through 50, inclusive,

Defendants.

Case No. RG21092943
Consolidated with 23CV040727 (Lead Case
RG21092943)

ASSIGNED FOR ALL PURPOSES TO:
Judge: Hon. Michael Markman
Dept.: 23

**[PROPOSED] ORDER AND JUDGMENT
GRANTING PRELIMINARY APPROVAL**

Date: December 9, 2025
Time: 10:00 a.m.
Dept.: 23

(Declaration of Lance Dacre and Justin
Rodriguez filed concurrently herewith)

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1 WHEREAS, this action is pending before this Court as a putative class and PAGA action
2 (the “Action”); and

3 WHEREAS, Plaintiffs, through an unopposed motion for preliminary approval, have
4 applied to this Court for an order preliminarily approving the settlement of the Action in
5 accordance with the Class Action and PAGA Settlement Agreement (“Settlement Agreement”)
6 and any exhibit annexed thereto, which sets forth the terms and conditions for a proposed
7 settlement and final resolution of the Action upon the terms and conditions set forth therein; and
8 the Court having read and considered the Settlement Agreement and the exhibit annexed thereto;
9 NOW, THEREFORE, IT IS HEREBY ORDERED:

10 1. This Order incorporates by reference the definitions in the final version of the
11 Settlement Agreement which has been filed with the Court and all terms defined therein shall have
12 the same meaning in this Order as set forth in the Settlement Agreement;

13 2. The Court hereby preliminarily certifies the Class for settlement purposes only. For
14 the purposes of this settlement, the Class is defined as: all persons who are or were employed by
15 The Hospital Committee for the Livermore-Pleasanton Areas d/b/a Stanford Health Care-
16 ValleyCare, and/or Stanford Health Care Tri-Valley in the state of California as hourly, non-
17 exempt employees at any time from March 19, 2017, up to October 22, 2024. (“Class Period”).
18 Should for whatever reason the Settlement not become final, the fact that the Parties were willing
19 to stipulate to class certification as part of the Settlement shall have no bearing on, nor be
20 admissible in connection with, the issue of whether a class should be certified in a non-settlement
21 context;

22 3. The Court hereby authorizes the retention of ILYM Group, Inc. as the Administrator
23 for the purpose of this Settlement;

24 4. The Court hereby preliminarily finds that James Hawkins, Isandra Fernandez, and
25 Lance Dacre of James Hawkins APLC and Galen T. Shimoda, Justin P. Rodriguez, and Renald
26 Konini of Shimoda & Rodriguez Law, PC, may act as counsel for the Class. The Court further
27 preliminarily finds that Plaintiffs Maybelyn Ugale and Brittny Swoopes may act as the Class
28 Representatives for the Class;

1 5. The Court hereby preliminarily APPROVES the proposed Court Approved Notice
2 of Class Action Settlement and Hearing Date for Final Approval. (“Class Notice”) The Court
3 further finds that the Class Notice appears to fully and accurately inform the Class Members of all
4 material elements of the proposed Settlement Agreement, of the Class Members’ right to be
5 excluded from the Class, and of each Class Member’s right and opportunity to object to the
6 Settlement. The Class Notice shall be mailed to the Class Members as set forth in the Settlement
7 Agreement;

8 6. The Court finds on a preliminary basis that the Settlement Agreement appears to be
9 within the range of reasonableness of a settlement that could ultimately be given final approval by
10 this Court. It appears to the Court on a preliminary basis that the settlement amount is fair,
11 adequate and reasonable as to all potential Class Members when balanced against the probable
12 outcome of further litigation relating to liability and damages issues. It further appears that
13 investigation and research have been conducted such that counsel for the Parties, at this time, are
14 able to reasonably evaluate their respective positions. It further appears to the Court that
15 settlement at this time will avoid substantial additional costs by all Parties, as well as avoid the
16 delay and risks that would be presented by the further prosecution of the Action. It further appears
17 that the Settlement has been reached as the result of serious and non-collusive, arms-length
18 negotiations;

19 7. The Court orders the following implementation schedule for further proceedings:

21 Preliminary approval order.	December 10, 2025
22 Deadline for Defendant to provide the 23 Class Data to the Administrator.	December 24, 2025 (within fourteen (14) calendar days after Court Grants 24 Preliminary Approval).
25 Mail notices to Settlement Class Members.	January 7, 2026 (within fourteen (14) 26 calendar days after Administrator Receives 27 Class Data from Defendant). 28

Response Deadline for email, fax or postmark by mail of any Request for Exclusion.	February 23, 2026 (forty-five (45) days after Administrator first mails Notice of Class Settlement to Settlement Class Members).
Deadline for receipt by the Administrator of any objections to the Settlement.	February 23, 2026 (forty-five (45) days after Administrator first mails Notice of Class Settlement to Settlement Class Members).
Response Deadline extension for re-mailed notices	March 9, 2026 (14 calendar days after Response Deadline expires)
Deadline for Class Counsel to file Motion for Final Approval of Settlement.	April 10, 2026
Final Approval Hearing.	May 4, 2026, at _____ a.m.

IT IS SO ORDERED.

Dated: _____, 2025

Honorable Michael Markman
Judge of the Alameda County Superior Court