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

EDMUNDO AVALOS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

THE HELP GROUP WEST, a California
corporation; THE HELP GROUP CHILD AND
FAMILY CENTER, a California corporation;
and DOES 1 through 100,

Defendants.

Case No. 19STCV23086

*[Assigned for all purposes to Hon. Carolyn
B. Kuhl; Dept. SSC-12]*

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

Date: July 5, 2023
Time: 10:30 a.m.
Dept.: SSC-12

Action Filed: July 3, 2019
Trial Date: None Set

FILED
Superior Court of California
County of Los Angeles

07/05/2023

David W. Slayton, Executive Officer / Clerk of Court

By: L. M'Greené Deputy

1 The Motion of Plaintiffs Edmundo Avalos and Megan Steron (“Plaintiffs”) for
2 Preliminary Approval of Class Action Settlement came on regularly for hearing before this Court
3 on July 5, 2023, at 10:30 a.m. This Court, having considered the proposed Stipulation of
4 Settlement (the “Settlement”), attached to the Declaration of Paul K. Haines 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 Settlement and finds its terms to be within the range of reasonableness of a settlement
10 that ultimately could be granted approval by the Court at a Final Fairness Hearing. For purposes
11 of the Settlement, the Court finds that the proposed Settlement Class is ascertainable and that
12 there is a sufficiently well-defined community of interest among the members of the Settlement
13 Class in questions of law and fact. Therefore, for settlement purposes only, the Court grants
14 conditional certification of the following Settlement Class, which includes two sub-classes:

15 The Help Group Sub-Class: All current and former non-exempt employees
16 of Defendants Help Group West and Help Group Child and Family Center
17 employed in the State of California during the time period of July 3, 2015
18 to March 12, 2023 (“Help Group Release Period.”).

18 Project Six Sub-Class: All current and former non-exempt employees of
19 Defendant Project Six employed in the State of California during the time
20 period of July 20, 2016 to March 12, 2023 (“Project Six Release Period.”).

21 2. For purposes of the Settlement, the Court designates named Plaintiffs Edmundo
22 Avalos and Megan Steron as Class Representatives, and designates Paul K. Haines, Sean M.
23 Blakely, and Alexandra R. McIntosh of Haines Law Group, APC as Class Counsel.

24 3. The Court designates Phoenix Settlement Administrators as the third-party
25 Settlement Administrator for mailing notices.

26 4. The Court approves, as to form and content, the Class Notice and Notice of
27 Estimated Settlement Award (collectively, the “Notice Packet”), attached as Exhibits A and B,
28 respectively, to the Settlement.

5. The Court finds that the form of notice to the Settlement Class regarding the

1 pendency of the action and of the Settlement, and the methods of giving notice to members of the
2 Settlement Class, constitute the best notice practicable under the circumstances, and constitute
3 valid, due, and sufficient notice to all of the Settlement Class members. The form and method of
4 giving notice complies fully with the requirements of California Code of Civil Procedure section
5 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California
6 and United States Constitutions, and other applicable law.

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

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

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

15 9. The Class Notice shall provide at least sixty (60) calendar days' notice for
16 Settlement Class members to opt out of, or object to, the Settlement.

17 10. The Final Fairness Hearing on the question of whether the Settlement should be
18 finally approved as fair, reasonable, and adequate is scheduled in Department SSC-12 of this
19 Court, located at 312 N. Spring Street, Los Angeles, California 90012 on
20 ~~PLCAG~~, 2023 at ~~10:00 a.m.~~ a.m. / p.m.

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

28 12. Counsel for the parties shall file memoranda, declarations, or other statements and

1 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation
 2 expenses, Plaintiffs' enhancement payments, payment to the LWDA, and settlement
 3 administration costs, prior to the Final Fairness Hearing according to the time limits set by the
 4 Code of Civil Procedure and the California Rules of Court.

5 13. An implementation schedule is below:

Event	Date
Defendants to provide Class Data to the Settlement Administrator no later than [10 business days after preliminary approval]:	July 19, 2023
Settlement Administrator to mail the Notice Packet to Settlement Class members no later than [10 business days after receiving Class Data]:	August 2, 2023
Deadline for Settlement Class members to request exclusion from, or object to, the Settlement [60 calendar days after mailing]:	October 2, 2023
Deadline for Plaintiffs to file their Motion for Final Approval of Class Action Settlement:	At least 16 court days prior to the Final Fairness Hearing
Final Fairness Hearing:	[REDACTED], 2023

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

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

22 **IT IS SO ORDERED.**

23 Dated: 07/05/2023
 24 _____, 2023



Carolyn B. Kuhl

 Carolyn B. Kuhl / Judge
 Hon. Carolyn B. Kuhl
 Judge of the Superior Court