

Electronically Received 06/30/2023 10:57 AM

1 Roman Otkupman, CSBN 249423
Roman@OLFLA.com
2 Nidah Farishta, CSBN 312360
Nidah@OLFLA.com

3 **OTKUPMAN LAW FIRM, A LAW CORPORATION**
5743 Corsa Ave., Suite 123
4 Westlake Village, CA 91362
Telephone: (818) 293-5623
5 Facsimile (888) 850-1310

6 Attorneys for Plaintiff,
SERENA LOPEZ, on behalf of herself and all others similarly situated, and on behalf of the
7 general public

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SERENA LOPEZ, on behalf of herself and all
others similarly situated, and on behalf of the
general public,

Plaintiff,

vs.

INVICTA SECURITY CA CORPORATION,
a Delaware Corporation, and DOES 1 through
10, inclusive,

Defendants.

CASE NO.: 22STCV19041

REVISED [PROPOSED] ORDER

FILED
Superior Court of California
County of Los Angeles
07/03/2023

David W. Slayton, Executive Officer / Clerk of Court
By: M. Fregoso Deputy

TO EACH PARTY AND TO COUNSEL OF RECORD FOR EACH PARTY:

IT IS HEREBY ORDERED:

1. The Court grants preliminary approval and conditional certification of the Class;
2. The Court grants preliminary approval of Plaintiff Serena Lopez 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;

1 6. The Court grants preliminary approval of Phoenix as Settlement Administrator and
2 payment of service in the amount up to twelve thousand eight hundred fifty dollars
3 (\$12,850.00);

4 ~~7. The Court grants preliminary approval of a Class Representative Enhancement Payment to~~
5 ~~Plaintiff Serena Lopez in the amount of seven thousand five hundred dollars (\$7,500.00).~~

6 ~~8. The Court grants preliminary approval of the payment to Class Counsel of reasonable~~
7 ~~attorney's fees of two hundred seventy three thousand nine hundred dollars (\$273,900.00)~~
8 ~~and costs up to twenty thousand dollars (\$20,000.00);~~

9 ~~9. The Court grants preliminary approval of the PAGA Payment in the amount of fifty~~
10 ~~thousand dollars (\$50,000.00). Seventy-five percent of this amount, or thirty seven~~
11 ~~thousand five hundred dollars (\$37,500.00) will be paid to the LWDA and twenty-five~~
12 ~~percent of this amount, or twelve thousand five hundred dollars (\$12,500.00) will be paid~~
13 ~~to the Aggrieved Employees who worked for Defendant during the PAGA Period on a pro~~
14 ~~rata basis.~~

15 10. The Court sets the following schedule for implementation of the terms of the Settlement
16 Agreement:

- 17 a. July 17, 2023: Deadline for Defendant to provide Class Data to Administrator;
- 18 b. July 31, 2023: Deadline for Administrator to mail Notice Packet;
- 19 c. August 31, 2023: Deadline for Plaintiff to file Motion for Final Approval of
- 20 Settlement and Motion for Attorneys Fees, Reimbursement of Costs, and Service
- 21 Payment to Plaintiff;
- 22 d. September 29, 2023: Deadline for Objections to Settlement, Objections to number
- 23 of Workweeks, and Opt Outs;
- 24 e. October 16, 2023: Deadline to file Administrator's Report regarding Opt Outs and
- 25 Objections;
- 26 f. October 16, 2023: Deadline to file responses to Objections; and
- 27 g. Court sets a hearing on final approval for October 16, 2023 at 8:30 a.m., in

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Department 6.



Elihu M. Berle

DATED: _____

SIGNED: _____

Elihu M. Berle / Judge
Honorable _____
Judge of the Superior Court