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AUG 24 2020

Room 106

FILED  
Superior Court of California  
County of Los Angeles

SEP 10 2020

Sherri R. Carter, Executive Officer/Clerk of Court  
By Dejane Wortham, Deputy  
Dejane Wortham

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ANGELICA VELASQUEZ

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

ANGELICA VELASQUEZ, as an individual and  
on behalf of all others similarly situated,

Case No. 19STCV30884

[Assigned for all purposes to Hon. Ann I.  
Jones, Dept. SS11]

Plaintiff,

vs.

~~[AMENDED PROPOSED]~~ ORDER  
GRANTING PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT

KDL PRECISION MOLDING CORP., a  
California corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Date: September 10, 2020  
Time: 10:00 a.m.  
Dept.: SS11

Complaint Filed: August 30, 2019  
Trial Date: None Set

1 The Motion of Plaintiff Angelica Velasquez (“Plaintiff”) for Preliminary Approval of Class  
2 Action Settlement (“Motion”) came on regularly for hearing before this Court on September 10, 2020  
3 at 10:00 a.m. in Department SS11. The Court, having considered the proposed Stipulation of Settlement  
4 (the “Settlement”), attached as Exhibit 1 to the Declaration of Scott M. Lidman filed concurrently with  
5 the Motion; having considered Plaintiff’s Motion, Memorandum of Points and Authorities in support  
6 thereof, and supporting declarations filed therewith; and good cause appearing, HEREBY ORDERS  
7 THE FOLLOWING:

8 1. The Court GRANTS preliminary approval of the class action settlement as set forth in  
9 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately  
10 could be granted approval by the Court at a Final Fairness Hearing. For purposes of the Settlement,  
11 the Court finds that the proposed Settlement Class is ascertainable and that there is a sufficiently well-  
12 defined community of interest among the members of the Settlement Class in questions of law and fact.  
13 Therefore, for settlement purposes only, the Court grants conditional certification of the following  
14 Settlement Class:

15 All current and former non-exempt, hourly, employees of Defendant KDL  
16 Precision Molding Corp. who worked in California from August 30, 2015  
through date of preliminary approval.

17 2. For purposes of the Settlement, the Court designates named Plaintiff Angelica  
18 Velasquez as Class Representative, and designates Scott M. Lidman, Elizabeth Nguyen, and Milan  
19 Moore of Lidman Law, APC and Paul K. Haines of Haines Law Group, APC as Class Counsel.

20 3. The Court designates Phoenix Settlement Administrators (“Phoenix”) as the third-party  
21 Settlement Administrator for mailing notices.

22 4. The Court approves, as to form and content, the Notice of Pendency of Class Action  
23 and Proposed Settlement and Notice of Individual Settlement Award attached to the Settlement as  
24 **Exhibit B.**

25 5. The Court finds that the form of notice to the Settlement Class regarding the pendency  
26 of the action and of the Settlement, and the methods of giving notice to Settlement Class members,  
27 constitutes the best notice practicable under the circumstances, and constitute valid, due, and sufficient  
28 notice to all members of the Settlement Class. The form and method of giving notice complies fully

1 with the requirements of California Code of Civil Procedure section 382, California Civil Code section  
2 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and  
3 other applicable law.

4 6. The Court further approves the procedures for Settlement Class members to opt out of  
5 or object to the Settlement, as set forth in the Notice of Pendency of Class Action and Proposed  
6 Settlement.

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

11 8. The Court directs the Settlement Administrator to mail the Notice of Pendency of Class  
12 Action and Proposed Settlement and Notice of Individual Settlement Award to all of the Class members  
13 in accordance with the terms of the Settlement.

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

16 10. The Final Fairness Hearing on the question of whether the Settlement should be finally  
17 approved as fair, reasonable, and adequate is scheduled in Department SS11 of this Court, located at  
18 312 N. Spring Street, Los Angeles, California 90012 on Feb. 18, 2020 at 10:00 a.m.  
19 p.m.

20 11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement  
21 should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a  
22 judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's  
23 application for reasonable attorneys' fees, reimbursement of litigation expenses, service award to  
24 Plaintiff, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties  
25 under the Labor Code Private Attorneys General Act ("PAGA") should be granted.

26 12. Counsel for the parties shall file memoranda, declarations, or other statements and  
27 materials in support of their request for final approval of the Settlement, attorneys' fees, litigation  
28 expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for

1 PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of  
2 Civil Procedure and the California Rules of Court.

3 13. Plaintiff is granted leave to file the Second Amended Complaint Class and  
4 Representative Action Complaint, which *was filed on Aug. 24, 2020 and* is attached as Exhibit A to the Settlement.

5 14. An implementation schedule is below:

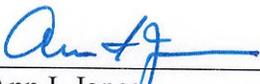
6 Event	Date	Actual Date <sup>1</sup>
7 Defendant to provide Class Data to Settlement Administrator	30 calendar days after issuance of the preliminary approval order	October 13, 2020 <sup>2</sup>
8 Settlement Administrator to mail Notice Packets to Class Members	15 business days after receiving Class Information from Defendant	November 3, 2020
9 Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator	January 4, 2021 <sup>3</sup>
10 Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 Court days before the Final Fairness Hearing	<i>January 26, 2021</i>
11 Final Fairness Hearing:	<i>February 18</i> , 2020 @ 10:00 a.m.	

12  
13  
14 14. Pending the Final Fairness Hearing, all proceedings in this action, other than  
15 proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order,  
16 are stayed.

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

20 **IT IS SO ORDERED.**

21 Dated: 9/10, 2020

22   
23 Honorable Ann I. Jones  
24 Judge of the Superior Court

25 <sup>1</sup> These dates are based on the Court granting preliminary approval at the hearing, currently noticed for  
26 September 10, 2020. At the time Plaintiff submitted the instant proposed order, a hearing date on  
27 Plaintiff's motion for preliminary approval had not been set.

<sup>2</sup> Plaintiff recognizes that 30 calendar days would be Saturday, October 10, 2020. Therefore, Plaintiff  
28 calendared this deadline for the next business day, Tuesday, October 13, 2020.

<sup>3</sup> Plaintiff recognizes that 60 calendar days would be Saturday, January 2, 2021. Therefore, Plaintiff  
calendared this deadline for the next business day, Monday, January 4, 2021.