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FILED  
Superior Court of California  
County of Los Angeles

JUL 09 2019

Sherri R. Carter, Executive Officer/Clerk  
By Stephanie Chung Deputy

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12 Attorneys for Plaintiff Rosemarie Williams,  
13 on behalf of herself and all others similarly situated

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE

16 ROSEMARIE WILLIAMS, an individual, on  
17 behalf of herself and others similarly situated,

Case No.: BC702272

18 Plaintiff,

CLASS ACTION

19 vs.

*[Assigned for all purposes to the Honorable  
Daniel J. Buckley]*

20 INCLUSION SERVICES, LLC, a California  
21 Limited Liability Company; and DOES 1  
22 through 50, inclusive,

**[PROPOSED] ORDER GRANTING  
MOTION FOR AN ORDER (1)  
PRELIMINARILY APPROVING THE  
CLASS ACTION SETTLEMENT, (2)  
APPROVING NOTICE OF CLASS  
ACTION SETTLEMENT, AND (3)  
SETTING HEARING FOR FINAL  
APPROVAL**

23 Defendants.

Date : June 26, 2019  
Time: 9:00 a.m.  
Dept. 1

RECEIVED  
LOS ANGELES SUPERIOR COURT

JUN 26 2019

I. LOVO

Complaint Filed: April 30, 2018  
First Amended Complaint: July 5, 2018

BY FAX

07/11/2019

1 Plaintiff Rosemarie Williams (“Plaintiff”) filed a Motion for an Order (1) preliminarily  
2 approving the class action settlement reached between the parties; (2) approving the notice of class  
3 action settlement, and (3) setting the final approval hearing (the “Motion”). The hearing on the  
4 Motion was set for June 26, 2019 at 9:00 a.m. in Department 1 of the above captioned court.  
5 Defendant INCLUSION SERVICES, LLC, a California Limited Liability Company,  
6 (“Defendant”), did not oppose the Motion. (Plaintiff and Defendant shall be collectively referred  
7 to herein as the “Parties.”)

8 The Court, having considered Plaintiff’s Motion, the memorandum of points and  
9 authorities in support thereof and supporting evidence and declarations, and Defendant’s  
10 agreement with and/or non-opposition to the Motion, hereby ORDERS, ADJUDGES, AND  
11 DECREES as follows:

12 1. The Preliminary Approval Motion is GRANTED and the Parties’ Joint Stipulation  
13 of Class Action Settlement (the “Stipulation”) attached to the Declaration of David Yeremian is  
14 preliminarily approved.

15 2. This Order incorporates by reference the definitions in the Stipulation and all terms  
16 defined therein shall have the same meaning in this Order.

17 3. The class is preliminarily certified for settlement purposes only. The class is  
18 defined as: all current and former Supported Living Services employees within the state of  
19 California who, are or were employed as non-exempt hourly employees by Defendant, from April  
20 30, 2014 to June 6, 2019, inclusive. Should the settlement not become final, this Order shall be  
21 rendered null and void and shall be vacated, and the fact that the Parties were willing to stipulate  
22 to class certification as part of the settlement shall have no bearing on, nor be admissible in  
23 connection with, the issue of whether a class should be certified in a non-settlement context.  
24 Should the settlement not become final, the Parties shall revert to their respective positions prior to  
25 notifying the Court of the settlement of the action.

26 4. The class action settlement contemplated by the Stipulation is preliminarily  
27 approved based upon the terms set forth in the Stipulation. The class action settlement appears to  
28 be fair, adequate, and reasonable to the Class. The class action settlement contemplated by the

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1 Stipulation falls within the range of reasonableness that could ultimately be granted final approval  
2 by the Court. The preliminary approval of the class action settlement includes the approval for  
3 purposes of the settlement of David Yeremian of David Yeremian & Associates, Inc., and Walter  
4 Haines of United Employees Law Group, PC, as Class Counsel; Rosemarie Williams as Class  
5 Representative and CPT Group, Inc. as Claims Administrator. Class Counsel is authorized to act  
6 on behalf of the class members with respect to all acts or consents required by or which may be  
7 given pursuant to the Stipulation and the class action settlement contemplated by the Stipulation,  
8 and such other acts reasonably necessary to consummate the settlement. The Claims Administrator  
9 is authorized to perform such acts as set forth in this Order and the Stipulation.

10 5. The revised Class Notice (or the "Notice") attached to the June, 21, 2019,  
11 Declaration of David Yeremian as Exhibit A, advising the Class of material terms and provisions  
12 of this settlement, the procedure for approval thereof, and their rights with respect thereto are  
13 approved as to form and content. The Court approves the procedure set forth in the Stipulation for  
14 Class Members to participate in, opt out of and/or object to the Settlement as set forth in the  
15 Notice.

16 6. The Notice shall be sent by first class mail to the Class in accordance with the  
17 schedule set forth below. The dates selected for the mailing and distribution of the Notice Packet  
18 as set forth below meet the requirements of due process and provide the best notice practicable  
19 under the circumstances and shall constitute due and sufficient notice to all persons entitled  
20 thereto:

21 a. Deadline for Defendant to provide to Claims Administrator the class list and  
22 related information in electronic form: 14 calendar days after the Order granting preliminary  
23 approval is filed and served.

24 b. Deadline for Claims Administrator to mail the Class Notice by first-class  
25 regular U.S. mail: 14 calendar days after receiving the class list and related information from  
26 Defendant.

27 c. Deadline for class members to mail objections or requests for exclusion to  
28 the Claims Administrator: calendar 60 days from the date of mailing of the Class Notice.

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d. Deadline for Class Counsel to file a Motion for Final Approval of the Class Action Settlement: October 24, 2019.

e. A Final Approval Hearing addressing the questions of whether the proposed settlement distribution, PAGA, award, attorneys' fees and costs to Class Counsel and the class representative enhancement should be approved as fair, reasonable and adequate as to the Settlement Class: November 18, 2019, at 10:30 a.m.

8. The Stipulation shall not be construed as an admission or evidence of either liability or the appropriateness of class certification in the non-settlement context as more specifically set forth in the Stipulation. Entry of this Order is without prejudice to the rights of Defendant to oppose certification of a class in this action should the proposed settlement not be granted final approval by the Court.

9. All further proceedings in this action shall be stayed except such proceedings necessary to implement this Order.

**IT IS SO ORDERED.**

DATED: July 9, 2019

*Daniel J. Buckley*  
HONORABLE DANIEL J. BUCKLEY  
JUDGE OF THE SUPERIOR COURT

07/11/2019

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

3 I am employed in the aforesaid county, State of California; I am over the age of 18 years  
4 and not a party to the within action; my business address is 535 N. Brand, Blvd. Suite 705,  
Glendale CA 91203.

5 On June 26, 2019, I served the foregoing: **[PROPOSED] ORDER GRANTING**  
6 **MOTION FOR AN ORDER (1) PRELIMINARILY APPROVING THE CLASS ACTION**  
7 **SETTLEMENT, (2) APPROVING NOTICE OF CLASS ACTION SETTLEMENT, AND**  
8 **(3) SETTING HEARING FOR FINAL APPROVAL** on Interested Parties in this action by  
placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

9 Robert D. Vogel  
10 Connie L.Chen  
11 Zoe Yuzna  
12 JACKSON LEWIS P.C.  
13 725 South Figueroa Street, Suite 2500  
14 Los Angeles, CA 90017

15  **(BY MAIL)** I placed such envelope with postage thereon fully paid in the United States  
16 mail at Glendale, California. I am "readily familiar" with this firm's practice of collecting and  
17 processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day  
18 in the ordinary course of business. I am aware that on motion of party served, service is presumed  
19 invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit  
20 for mailing in affidavit.

21  **(COURTESY COPY BY ELECTRONIC TRANSMISSION)** by use of email by  
22 scanning the documents and any and all documents and emailing them to email addresses above.


23  **(BY PERSONAL SERVICE)** I personally delivered said envelope to the office of the  
24 person and address identified on the attached service list.

25  **(BY ELECTRONIC SERVICE VIA CASE ANYWHERE)** Based on a court order, I  
26 caused the above-entitled document(s) to be served through Case Anywhere at  
27 www.caseanywhere.com addressed to all parties appearing on the electronic service list for the  
28 above-entitled case. The service transmission was reported as complete and a copy of the Case  
Anywhere Filing Receipt Page/Confirmation will be filed, deposited, or maintained with the  
original document(s) in this office.

29  **(BY FACSIMILE)** On \_\_\_\_\_ before 5:00 p.m., I transmitted such documents  
30 from our facsimile machine number (818) 230-0308 to the person(s) at the facsimile numbers  
31 listed on the attached service list. Said transmission was reported as complete and without error.  
32 A copy of the transmission report which was properly issued by the transmitting facsimile  
33 machine is attached hereto.

34  **(STATE)** I certify (or declare) under penalty of perjury under the laws of the State of  
35 California that the foregoing is true and correct.

36 Executed on June 26, 2019, at Glendale, California.

37   
38 Natalia Bermudes

6/26/2019