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1 SANI LAW, APC  
2 SAM SANI (SBN 273993)  
3 15720 Ventura Blvd., Suite 405  
4 Encino, CA 91436  
5 Telephone: (310) 935-0405  
6 Facsimile: (310) 935-0409  
7 [Ssani@SaniLawFirm.Com](mailto:Ssani@SaniLawFirm.Com)

8 Attorneys for Plaintiffs  
9 ASHLEY FONTENETTE  
10 WILLISHIA JOHNSON

11 *[Attorneys continued on next page]*

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

14 ASHLEY FONTENETTE, an individual, on  
15 behalf of herself and all others similarly  
16 situated,

17 Plaintiffs,

18 Vs.

19 SPECIAL SERVICE FOR GROUPS, INC., a  
20 California Corporation, and DOES 1 through  
21 100,

22 Defendants.

23 RANDY RENE, MARIO CAMPOS, LARRY  
24 GRAY, and ANA RODRÍGUEZ, on behalf of  
25 themselves and all others similarly situated,

26 Plaintiffs,

27 Vs.

28 SPECIAL SERVICE FOR GROUPS, INC., a  
California corporation, AND DOES 1-20  
INCLUSIVE,

Defendants.

CASE NO.: 19STCV46726  
(RELATED CASE NO.: 21STCV09406)

*[Assigned for all purposes to Hon. William F. Highberger – Dept. 10]*

~~PROPOSED~~ **ORDER GRANTING  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

T æ&@  
Date: ~~January 10~~, 2022  
Time: ~~1:30 p.m.~~  
Dept. 10

Complaint Filed: December 30, 2019  
FAC Filed: March 5, 2020  
SAC Filed: June 22, 2020  
Trial Date: Not Set

**FILED**  
Superior Court of California  
County of Los Angeles

03/04/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: J. Almanza Deputy

1 **HAINES LAW GROUP, APC**  
2 PAUL K. HAINES (SBN 248226)  
3 2155 Campus Drive, Suite 180  
4 El Segundo, California 90245  
5 Telephone: (424) 292-2350  
6 Facsimile: (424) 292-2355  
7 [PHaines@HainesLawGroup.Com](mailto:PHaines@HainesLawGroup.Com)

8 **TOJARIEH LAW FIRM, PC**  
9 JOSEPH TOJARIEH (SBN 265492)  
10 10250 Constellation Blvd., Suite 100  
11 Los Angeles, CA 90067  
12 Telephone: (310) 553-5533  
13 Facsimile: (310) 553-5536  
14 [JFT@TojariehLaw.Com](mailto:JFT@TojariehLaw.Com)

15 Attorneys for Plaintiffs  
16 ASHLEY FONTENETTE  
17 WILLISHIA JOHNSON  
18  
19  
20  
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1 **PROPOSED ORDER**

2 Plaintiffs Ashley Fontenette and Willishia Johnson (collectively, “Plaintiffs”) Motion for  
3 Preliminary Approval of Class Action Settlement (“Motion”) came regularly for hearing before  
4 this Court on ~~January 10, 2022 at 1:30 p.m.~~ ~~T&@ EGCG~~. The Court, having considered the proposed Stipulation  
5 of Settlement (“Settlement Agreement” or “Settlement”) and Class Notice filed by Plaintiffs;  
6 having considered Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement,  
7 memorandum of points and authorities in support thereof, and supporting declarations filed  
8 therewith; and good cause appearing, **HEREBY ORDERS THE FOLLOWING:**

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

16 All current and former non-exempt employees of Defendant Special Service for  
17 Groups, Inc. in California at any time from December 30, 2015 through June 30, 2021  
18 (“Class Period”).

19 2. For purposes of the Settlement, the Court designates named Plaintiffs Ashley  
20 Fontenette and Willishia Johnson as Class Representatives, and Paul K. Haines of Haines Law  
21 Group, APC, Joseph Tojarieh of Tojarieh Law Firm, PC, and Sam Sani of Sani Law, APC as  
22 Class Counsel.

23 3. The Court designates CPT Class Action Administration as the third-party Claims  
24 Administrator for mailing notices.

25 4. The Court approves, as to form and content, the Notice Packet (comprised of the  
26 Class Notice and Notice of Settlement Award) filed by Plaintiffs.

27 5. The Court finds that the form of notice to the Settlement Class regarding the  
28 pendency of the action and of the Settlement, and the methods of giving notice to members of the

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

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

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

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

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

16 10. The Final Fairness Hearing on the question of whether the Settlement should be  
17 finally approved as fair, reasonable, and adequate is scheduled in Department 10 of this Court,  
18 located at 312 North Spring Street, Los Angeles, CA 90012, on FR 1 A, 2022 at FFA.

19 11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement  
20 should be approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a  
21 judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiffs'  
22 application for an enhancement payment, claims administration costs, Labor and Workforce  
23 Development Agency's ("LWDA") share of PAGA penalties, and Class Counsel's attorneys' fees  
24 and costs should be granted.

25 12. Counsel for the parties shall file memoranda, declarations, or other statements and  
26 materials in support of their request for final approval of Plaintiffs' application for enhancement  
27 payments, claims administration costs, LWDA's share of PAGA penalties, and Class Counsel's  
28 attorneys' fees and costs no later than FR 1 A, ~~2021~~.

13. An implementation schedule is below:

Event	Date
Defendant to provide class contact information to Claims Administrator no later than:	Within 10 calendar days after entry of Order granting preliminary approval of class actions settlement
Claims Administrator to mail the Class Notice to the Settlement Class no later than:	Within 7 calendar days from Claims Administrator's receipt of class contact information from Defendant)
Deadline for Class Members to submit disputes, request exclusion from, or object to the Settlement:	Within 60 calendar days of the date of the Claims Administrator's initial mailing of the Class Notice to Settlement Class
Final Fairness Hearing:	R [ ^ ] A E , 2022 at FF/ [ ^ ]

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

15. Counsels for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement that are not materially inconsistent with either this Order or the terms of the Settlement.

**IT IS SO ORDERED.**

Dated: 03/04/2022, 2022



— William F. Highberger / Judge  
Honorable William F. Highberger  
Judge of the Superior Court