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10 Attorneys for Plaintiff Laura Herrera, individually and on behalf of others similarly situated  
11 and other aggrieved employees

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16 **JAMES HAWKINS APLC**

17 9880 Research Drive, Suite 200

18 Irvine, CA 92618

19 Phone: (949) 387-7200

20 Fax: (949) 387-6676

21 Attorneys for Plaintiff, VALERIE CHAVEZ

22 on behalf of herself and all others similarly situated

23 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

24 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

25 LAURA HERRERA, VALERIE  
26 CHAVEZ, individually and on behalf of  
27 others similarly situated and other  
28 aggrieved employees,

Plaintiffs,

v.

CASCADE LIVING GROUP  
MANAGEMENT, LLC, an active  
Washington Limited Liability Company;  
and DOES 1 through 10,

Defendants.

Case No.: 20STCV48606 (related to  
21STCV35724)

**CLASS AND REPRESENTATIVE ACTION**

*[Assigned to Hon. Stuart M. Rice  
in Dept. SS-1]*

**NOTICE OF ENTRY OF ORDER  
GRANTING MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

Final Approval Hearing Date: Feb. 26, 2024

Final Approval Hearing Time: 10:30 a.m.

1           **TO THE HONORABLE COURT, PARTIES, AND THEIR ATTORNEYS OF**  
2 **RECORD:**

3           **PLEASE TAKE NOTICE** that, on August 14, 2023, before the Honorable Stuart M.  
4 Rice in Department SS-1 of the above-entitled court, hearing was held on Plaintiffs’ Motion for  
5 Preliminary Approval of Class Action Settlement in the above-entitled case. Attorney Haik  
6 Hacopian of Mooradian Law, APC appeared remotely on behalf of Plaintiff Laura Herrera and  
7 the putative class, Attorney Anthony L. Draper of James Hawkins APLC appeared remotely on  
8 behalf of Plaintiff Valerie Chavez and the putative class, and attorney Warren F. Hodges of  
9 Hanson Bridgett LLP appeared remotely on behalf of Defendant Cascade Living Group  
10 Management LLC.

11           At the hearing, the Court entered the Order Granting Motion for Preliminary Approval  
12 of Class Action Settlement, a true and correct copy of which is appended hereto.

13  
14 Dated: August 15, 2023

**MOORADIAN LAW, APC**  
**JAMES HAWKINS APLC**

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17 *By: /s/ Haik Hacopian* \_\_\_\_\_  
18 Zorik Mooradian, Esq.,  
19 Haik Hacopian, Esq.,  
20 James R. Hawkins, Esq.,  
21 Isandra Fernandez, Esq.,  
22 Attorneys for Plaintiffs, individually and on  
23 behalf of other persons similarly situated and  
24 other aggrieved employees  
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**FILED**  
Superior Court of California  
County of Los Angeles  
08/14/2023

David W. Slayton, Executive Officer / Clerk of Court  
By: \_\_\_\_\_ A. He \_\_\_\_\_ Deputy

6 Attorneys for Plaintiff Laura Herrera, individually and on behalf of others similarly  
situated and other aggrieved employees

7 [ADDITIONAL COUNSEL LISTED AFTER CAPTION]

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

11 LAURA HERRERA, VALERIE  
12 CHAVEZ, individually and on behalf of  
13 others similarly situated and other  
aggrieved employees,

14 Plaintiffs,

15 v.

16 CASCADE LIVING GROUP  
17 MANAGEMENT, LLC, an active  
Washington Limited Liability Company;  
18 BPM SENIOR LIVING COMPANY, an  
active Delaware Corporation; and DOES  
19 1 through 10,

20 Defendants.

Case No.: 20STCV48606 (related to  
21STCV35724)

CLASS AND REPRESENTATIVE  
ACTION

[Assigned to Hon. Stuart M. Rice  
in Dept. SS-1]

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

[FILED CONCURRENTLY WITH  
NOTICE OF MOTION AND MOTION  
FOR PRELIMINARY APPROVAL;  
DECLARATION OF HAIK  
HACOPIAN WITH EXHIBITS;  
DECLARATION OF ZORIK  
MOORADIAN; DECLARATION OF  
JAMES R. HAWKINS;  
DECLARATION OF LAURA  
HERRERA; AND DECLARATION OF  
VALERIE CHAVEZ]

Date: August 14, 2023  
Time: 10:30 a.m.  
Dept.: SS-1

Electronically Received 06/16/2023 06:48 PM

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Irvine, CA 92618  
Phone: (949) 387-7200  
Fax: (949) 387-6676

Attorneys for Plaintiff, VALERIE CHAVEZ  
on behalf of herself and all others similarly situated

1           On August 14, 2023, the Court considered the motion of Plaintiff Laura Herrera and  
2 Plaintiff Valerie Chavez for preliminary approval of the Parties’ proposed class action  
3 Settlement.

4           The Court having read and considered the papers on the motion submitted by Class  
5 Counsel, having heard the presentation of Class Counsel and Defendant’s counsel, having  
6 reviewed all of the submissions presented with respect to the proposed Settlement, having  
7 carefully considered the requirements for class certification, and having preliminarily  
8 determined that the Settlement is fair, adequate, and reasonable, it is hereby ORDERED  
9 ADJUDGED, and DECREED that:

10           1.       Preliminary Approval of the Class Action Settlement is GRANTED pursuant  
11 to Cal. Rules of Court, rule 3.769;

12           2.       The Settlement, as set forth in the Stipulated Settlement Agreement  
13 (“Settlement Agreement”), is in all respects fair, reasonable, adequate, and in the best interests  
14 of the Settlement Class, and it is preliminarily approved. Except as expressly set forth herein,  
15 the Parties shall effectuate the Settlement Agreement according to its terms. The Settlement  
16 Agreement, and every term and provision thereof, shall be deemed incorporated herein as if  
17 explicitly set forth and shall have full force of an Order of this Court;

18           3.       The Court finds that the notice plan set forth in the Settlement Agreement  
19 constitutes the best notice practicable under the circumstances and shall constitute due and  
20 sufficient notice to the Settlement Class of the pendency of the Action, the terms of the  
21 Settlement Agreement, the Final Approval Hearing, and satisfies the requirements of  
22 California law and federal due process law;

23           4.       The proposed Settlement Class is provisionally certified under Civ. Code §  
24 382, with the Class consisting of:

25           All current and former non-exempt employees employed by Cascade  
26 Living Group, Inc., Cascade Living Group Management, LLC,  
Cascade Living Group – Hemet, LLC, or Cascade Living Group –  
Grass Valley, LLC, in California during the period starting December  
21, 2016 to December 13, 2022. (“Class Period”)

5.       Plaintiff Laura Herrera and Plaintiff Valerie Chavez are appointed as the Class

1 Representatives;

2 6. Zorik Mooradian and Haik Hacopian of Mooradian Law, APC and James R.  
3 Hawkins and Isandra Fernandez of James Hawkins APLC are appointed as Class Counsel for  
4 the class;

5 7. CPT Group is appointed as the third-party administrator (“Settlement  
6 Administrator”);

7 8. The proposed settlement of Plaintiffs’ Private Attorneys General Act (the  
8 “PAGA”) claims is preliminarily approved;

9 9. The proposed Class Notice, attached as Exhibit “1” to the Settlement  
10 Agreement, is approved and shall be disseminated according to the notice plan described in  
11 the Settlement Agreement and substantially in the form submitted;

12 10. In conformity with the Class Notice, Settlement Class Members wishing to be  
13 excluded from the Settlement Class must submit a written request for exclusion requesting  
14 exclusion from the Settlement on or before the expiration of the opt out period (60 days after  
15 the date that the Class Notice is mailed);

16 11. In conformity with the Class Notice, any Settlement Class Member who does  
17 not opt out of the Settlement may object to the settlement, either personally or through an  
18 attorney, orally at the Final Approval Hearing or by providing written notice that the  
19 Settlement Class Member is objecting to the Settlement Administrator, which written notice  
20 must be postmarked no later than 60 days after the date that the Class Notice is mailed;

21 12. A Final Approval Hearing will be held on 04/28/2020 at 10:00 AM,  
22 to determine if the proposed settlement should be granted final approval. The Court will hear  
23 all evidence and argument necessary to evaluate the Settlement, and will consider Plaintiffs’  
24 request for Class Representative Service Payments, Class Counsel’s request for Attorney’s  
25 Fees, Class Counsel’s request for Costs, payment to the LWDA, and payment to the  
26 Settlement Administrator. Any Settlement Class Member who complies with the procedures  
and requirements specified in the Class Notice may appear at the Final Approval Hearing;

13. Class Counsel is to file and serve the Motion for Final Approval of Class

1 Action Settlement and for Awards of Class Representative Service Awards, Attorneys' Fees,  
2 Costs, payment to the LWDA, and payment to the Settlement Administrator, by  
3 Ray & Associates; and

4 14. The Court shall retain jurisdiction necessary to effectuate this Order and  
5 consider all further applications out of or in connection with the Settlement.

7 Dated: CE \* v • d f i E G C H



Handwritten signature of Stuart M. Rice in black ink.

8 By: Stuart M. Rice / Judge  
9 Honorable Stuart M. Rice  
10 Judge of the Superior Court

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**PROOF OF SERVICE**  
**20STCV48606**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action, my business address is 24007 Ventura Blvd., Suite 210, Calabasas, CA 91302.

On **August 15, 2023**, I served on the parties of record in this action the foregoing document(s) described as:

**NOTICE OF ENTRY OF ORDER GRANTING MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

on the parties to this action by placing them in a sealed envelope(s) addressed as follows:

<p>Diane Marie O'Malley, Esq. <a href="mailto:domalley@hansonbridgett.com">domalley@hansonbridgett.com</a> Emily J. Leahy, Esq. <a href="mailto:eleahy@hansonbridgett.com">eleahy@hansonbridgett.com</a> Hanson Bridgett LLP 425 Market Street, 26<sup>th</sup> Floor San Francisco, CA 94105 Telephone: (415) 777-3200 Facsimile: (415) 541-9366</p> <p>Attorneys for Defendant Cascade Living Group Management, LLC</p>	<p>Warren Hodges, Esq. <a href="mailto:whodges@hansonbridgett.com">whodges@hansonbridgett.com</a> Hanson Bridgett LLP 500 Capitol Mall, Suite 1500 Sacramento, CA 95814 Telephone: (916) 491-3015 Facsimile: (916) 491-3075</p> <p>Attorneys for Defendant Cascade Living Group Management, LLC</p>
<p>Julia Botezatu, Esq. <a href="mailto:jbotezatu@nossaman.com">jbotezatu@nossaman.com</a> Nossaman LLP 18101 Von Karman Avenue, Suite 1800 Irvine, CA 92612 Phone: (949) 833-7800 Fax: (949) 833-7878</p> <p>Attorneys for Defendant BPM Senior Living Company</p>	<p>Allison Callaghan, Esq. <a href="mailto:acallaghan@nossaman.com">acallaghan@nossaman.com</a> Nossaman LLP 621 Capitol Mall, Suite 2500 Sacramento, CA 95814 Phone: (916) 442-8888 Fax: (916) 442-0382</p> <p>Attorneys for Defendant BPM Senior Living Company</p>
<p>Isandra Fernandez, Esq. <a href="mailto:isandra@jameshawkinsaplc.com">isandra@jameshawkinsaplc.com</a> James Hawkins, Esq. <a href="mailto:james@jameshawkinsaplc.com">james@jameshawkinsaplc.com</a> Lance Dacre, Esq. <a href="mailto:lance@jameshawkinsaplc.com">lance@jameshawkinsaplc.com</a> Anthony Draper, Esq. <a href="mailto:anthony@jameshawkinsaplc.com">anthony@jameshawkinsaplc.com</a> JAMES HAWKINS APLC 9880 Research Drive, Suite 200</p>	<p>Labor &amp; Workforce Development Agency 800 Capitol Mall, MIC-55 Sacramento, CA 95814</p> <p>(Filed online at <a href="https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html">https://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html</a>)</p>



1 Irvine, CA 92618  
2 Phone: (949) 387-7200  
3 Fax: (949) 387-6676

4 Attorneys for Plaintiff Valerie Chavez

5  **VIA ELECTRONIC SERVICE** –Based on a court order or agreement of the  
6 parties to accept service by electronic transmission, I caused the document(s) to be sent to  
7 the above persons listed at their electronic notification addresses by uploading the  
8 document(s) to the CASEANYWHERE service.

9  **STATE** – I declare under penalty of perjury under the laws of the “State of  
10 California that the above is true and correct

11 Executed on **August 15, 2023** at Calabasas, California.

12  
13 /s/Haik Hacopian

14 Haik Hacopian  
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