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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

**MAR 10 2021**

DAVID H. YAMASAKI, Clerk of the Court

BY: \_\_\_\_\_, DEPUTY

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10 Attorneys for Plaintiff Alma G. Alvarez, individually and on behalf of other persons  
11 similarly situated and similarly aggrieved employees

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER

14 ALMA G. ALVAREZ, individually and  
15 on behalf of other persons similarly  
16 situated and similarly aggrieved  
17 employees,

18 Plaintiffs,

19 v.

20 GREENFIELD CARE CENTER OF  
21 FULLERTON, LLC, an active California  
22 Limited Liability Company; and DOES 1  
23 through 10,

24 Defendants.

Case No.: 30-2017-00958478-CU-OE-CXC

CLASS AND REPRESENTATIVE  
ACTION

[Assigned to Hon. William D. Claster  
in CX-104]

**~~PROPOSED~~ ORDER GRANTING  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: February 26, 2021

Time: 9:00 a.m.

Dept.: CX-104

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT

1 On February 26, 2021, the Court considered the motion of Plaintiff Alma G. Alvarez  
2 for preliminary approval of the Parties' proposed class action Settlement.

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

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

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

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

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

24 All current and former hourly, non-exempt employees of  
25 Defendant Greenfield Care Center of Fullerton, LLC in  
26 California at any time from November 29, 2013 through April  
13, 2020. ("Class Period").

5. Plaintiff Alma G. Alvarez is appointed as Class Representative;

6. Zorik Mooradian and Haik Hacopian of Mooradian Law, APC are appointed

1 as Class Counsel for the class;

2 7. CPT Group, Inc., is appointed as the third-party administrator ("Settlement  
3 Administrator");

4 8. The proposed settlement of Plaintiff's Private Attorneys General Act (the  
5 "PAGA") claims is preliminarily approved;

6 9. The proposed: (1) Class Notice, attached as Exhibit 1 to the Settlement  
7 Agreement; (2) Opt-Out Form, attached as Exhibit 2 to the Settlement Agreement; and (3)  
8 Workweek Dispute Form, attached as Exhibit 3 to the Settlement Agreement, are approved  
9 and shall be disseminated according to the notice plan described in the Settlement Agreement  
10 and substantially in the forms submitted;

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

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

20 12. A Final Approval Hearing will be held on August 13, 2021 at 9:00 a.m. to  
21 determine if the proposed settlement should be granted final approval. The Court will hear all  
22 evidence and argument necessary to evaluate the Settlement, and will consider Plaintiff's  
23 request for Class Representative Service Payment, Class Counsel's request for Attorney's  
24 Fees, Class Counsel's request for Costs, payment to the LWDA, and payment to the  
25 Settlement Administrator. Any Settlement Class Member who complies with the procedures  
26 and requirements specified in the Class Notice may appear at the Final Approval Hearing;

14. Class Counsel is to file and serve the Motion for Final Approval of Class  
Action Settlement and for Award of Class Representative Service Award, Attorneys' Fees,

1 Costs, payment to the LWDA, and payment to the Settlement Administrator, by July 22, 2021;  
2 and

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

5  
6 Dated: 3-10-21

By: William D. Claster  
Honorable William D. Claster  
Judge of the Superior Court

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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of  
3 18 and am not a party to the within action, my business address is 24007 Ventura Blvd., Suite  
4 210, Calabasas, CA 91302.

5 On March 2, 2021, I served on the parties of record in this action the foregoing  
6 document(s) described as:

7 **[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR  
8 PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

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

10 LINDBERGH PORTER,  
11 LITTLER MENDELSON, P.C.  
12 LPorter@littler.com  
13 333 Bush Street  
14 34th Floor  
15 San Francisco, CA 94104

16 Attorneys for Defendant Greenfield Care Center of  
17 Fullerton, LLC

18 ☒ **VIA E-MAIL OR ELECTRONIC TRANSMISSION** – Based on a court order  
19 or agreement of the parties to accept service by e-mail or electronic transmission, I caused  
20 the document(s) to be sent to the above persons listed at their e-mail addresses listed on the  
21 attached service list. I did not receive, within a reasonable time after transmission, any  
22 electronic message or other indication that the transmission was unsuccessful

23 ☒ **STATE** – I declare under penalty of perjury under the laws of the State of  
24 California that the above is true and correct.

25 Executed on March 2, 2021 at Calabasas, California.

26 /s/Haik Hacopian  
27 Haik Hacopian  
28