1 2 3 4	Raul Perez (SBN 174687) Raul.Perez@capstonelawyers.com Robert J. Drexler, Jr. (SBN 119119) Robert.Drexler@capstonelawyers.com Molly A. DeSario (SBN 230763) Molly.DeSario@capstonelawyers.com Jonathan Lee (SBN 267146) Jonathan.Lee @capstonelawyers.com	FILED Superior Court of California County of Los Angeles 05/20/2022 Sherri R. Carter, Executive Officer / Clerk of Cour By:B. Guerrero Deputy	
5	CAPSTONE LAW APC 1875 Century Park East, Suite 1000	by bepary	
6	Los Angeles, California 90067 Telephone: (310) 556-4811		
7	Facsimile: (310) 943-0396		
8	Attorneys for Plaintiff Leticia Limon		
9	SUPERIOR COURT OF T	HE STATE OF CALIFORNIA	
10	FOR THE COUNTY OF LOS ANGELES		
11	LETICIA LIMON, individually, and on behalf of other members of the general public similarly	Case No.: 20STCV37266	
12	situated,	Assigned to the Hon. Kenneth R. Freeman	
13	Plaintiff,	[AMENDED PROPOSED] ORDER GRANTING MOTION FOR PRELIMINARY	
14	VS.	APPROVAL OF CLASS ACTION SETTLEMENT	
15	CRESTLINE HOTELS & RESORTS, LLC, a Delaware limited liability company; BARCELO	Date: March 17, 2022	
16	CRESTLINE CORPORATION, a Maryland corporation; and DOES 1 through 10, inclusive,	Time: 10:00 a.m. Place: Department 14	
17	Defendants.		
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1	ORDER	
2	The Court having considered Plaintiff's Motion for Preliminary Approval of the Class Action	
3	Settlement (the "Motion"), and the supplemental points and authorities submitted in support of the	
4	Motion, including the Amended Joint Stipulation of Class Action Settlement and Release ("Settlement	
5	Agreement" or "Settlement"), and GOOD CAUSE appearing, IT IS HEREBY ORDERED that the	
6	Motion is GRANTED , subject to the following findings and orders:	
7	1. This Order incorporates by reference the Settlement Agreement, and unless indicated	
8	otherwise, all capitalized terms used herein will have the same meaning as set forth in the Settlement	
9	Agreement.	
10	2. The Settlement Class shall be conditionally certified for settlement purposes only and	
11	shall consist of all persons who were employed in non-exempt positions at one of Crestline Hotels &	
12	Resorts LLC's California managed hotels at any time from September 17, 2016 through Preliminary	
13	Approval.	
14	3. The class action settlement set forth in the Settlement Agreement, entered into among	
15	the Parties and their counsel, is preliminarily approved as it appears to be proper, to fall within the range	
16	of reasonableness, to be the product of arm's-length and informed negotiations, to treat all Class	
17	Members fairly, and to be presumptively valid, subject only to any objections that may be raised at or	
18	before the final approval hearing.	
19	4. The Court further finds that Plaintiff conducted extensive investigation and research, and	
20	that she was able to reasonably evaluate her position and the strengths and weaknesses of her claims and	
21	her ability to certify them. Plaintiff has provided the Court with enough information about the nature and	
22	magnitude of the claims being settled, as well as the impediments to recovery, to make an independent	
23	assessment of the reasonableness of the terms to which the Parties have agreed.	
24	5. The Court also finds that settlement now will avoid additional and potentially substantial	
25	litigation costs, as well as delay and risks if the Parties were to continue to litigate the Action.	
26	6. The Court preliminarily approves the Settlement Agreement, including all the terms and	
27	conditions set forth therein and the Class Settlement Amount and allocation of payments.	
28	7. The rights of any potential dissenters to the proposed Settlement are adequately	
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1	protected in that they may exclude themselves from the Settlement and proceed with any alleged claims	
2	they may have against Defendants, or they may object to the Settlement and appear before this Court.	
3	8. The Court approves, as to form and content, the proposed Notice of Class Action	
4	Settlement ("Notice Packet").	
5	9. The Court directs the mailing, by First-Class U.S. mail, of the Notice Packets to Class	
6	Members in accordance with the schedule set forth below and the other procedures described in the	
7	Settlement Agreement. The Court finds that the method selected for communicating the preliminary	
8	approval of the Settlement Agreement to Class Members is the best notice practicable under the	
9	circumstances, constitutes due and sufficient notice to all persons entitled to notice, and thereby satisfies	
10	due process.	
11	10. The Court appoints Plaintiff Leticia Limon as the representative for the Settlement Class	
12	conditionally certified by this Order.	
13	11. The Court appoints Capstone Law APC as Class Counsel. The Court finds that counsel	
14	have demonstrable experience litigating, certifying, and settling class actions, and will serve as adequate	
15	counsel for the Class conditionally certified by this Order.	
16	12. The Court approves and appoints CPT Group, Inc. as the Settlement Administrator.	
17	13. The following dates shall govern for purposes of this Settlement:	
	Doto Event	

18	Date	Event	
10	June 6, 2022 (or not later than 14 calendar days	Last day for Defendants to produce the Class List	
19	after the Court grants preliminary approval of the	to the Settlement Administrator.	
•	Settlement Agreement, if later)		
20	June 13, 2022 (or not later than 21 calendar days	Last day for the Settlement Administrator to mail	
21	after the Court grants preliminary approval of the	Notice Packets to all Class Members.	
21	Settlement Agreement, if later)		
22	July 28, 2022 (or not later than 45 calendar days	Last day for Class Members to submit Requests	
	after the Settlement Administrator mails the Notice	for Exclusion or Written Objections to the	
23	Packets, if later)	Settlement.	
24	September 9, 2022	Last day for Plaintiff to file the Motion for Final	
21		Approval of Class Action Settlement and Motion	
25		for Attorneys' Fees, Costs, and a Class	
		Representative Enhancement Payment.	
26	October 11, 2022 at 10:00 a.m.	Hearing on Motion for Final Approval of Class	
27		Action Settlement and Motion for Attorneys' Fees,	
21		Costs, and a Class Representative Enhancement	
28		Payment.	
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1		e right to continue or adjourn the final approval hearing
2	without further notice to the Class Members.	a there is a second a
3		(23) Mu-
4	IT IS SO ORDERED.	Kannath D. Davier (Malas
5	Dated: 05/20/2022	Kenneth R. Freeman/Judge Hon. Kenneth R. Freeman
6		Los Angeles Superior Court Judge
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1	PROOF OF SERVICE		
2	I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 1875 Century Park East, Suite 1000 Los Angeles, California 90067.		
3	On May 16, 2022, I served the document described as: [AMENDED PROPOSED] ORDER		
4 5	GRANTING MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT on the interested parties in this action by sending [] the original [or] [\checkmark] a true copy thereof [\checkmark] to interested parties as follows [or] [] as stated on the attached service list:		
6	Nancy Yaffe Attorneys for Defendant		
7	Daniel V. Kitzes,CRESTLINE HOTELS & RESORTS, LLC,Fox Rothschild LLPand BARCELO CRESTLINE		
8	10250 Constellation Blvd., Suite 900CORPORATIONLos Angeles, CA 90067-6209CORPORATION		
9	NYaffe@foxrothschild.com		
10	dkitzes@foxrothschild.com		
11	[] BY MAIL (ENCLOSED IN A SEALED ENVELOPE): I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am "readily familiar" with this firm's practice of collection and processing correspondence for		
12 13	mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles. California.		
14	[] BY E-MAIL: I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-		
15	mail address or e-mail of record in this action.		
16 17	[] BY FAX: I hereby certify that this document was served from Los Angeles, California, by facsimile delivery on the parties listed herein at their most recent fax number of record in this action.		
18 19	[X] BY PERSONAL SERVICE: Pursuant to the Court's February 5, 2021, Order Authorizing Electronic Service, the above named document(s) has been electronically served on counsel of record by transmission through the Case Anywhere system on the		
20 21	date below. The transmission of these documents to the Case Anywhere system was reported as complete and a copy of the Case Anywhere Transaction Receipt will be maintained along with the original document(s) and proof of service in our office.		
22 23 24	[] BY OVERNIGHT DELIVERY: I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.		
25	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 16, 2022, at Los Angeles, California.		
26	Xochitl Tapia		
27	Type/Print Name Signature		
28			
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