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general public

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Attorneys for Plaintiff ROSIO VENTURA, individually, and
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF KERN

ABDO ALGHAZALI, ROSIO VENTURA, on
behalf of themselves and all others similarly
situated, and on behalf of the general public,

Plaintiffs,

vs.

THREE-WAY CHEVROLET CO., a California
Corporation, and DOES 1 through 10, inclusive,

Defendants.

CASE NO. BCV-25-101972

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**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

FILED
SUPERIOR COURT OF CA, COUNTY OF KERN

SEP 15 2026

BY *[Signature]* DEPUTY

**[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

IT IS HEREBY ORDERED:

1. The Court grants preliminary approval of the Class Action and PAGA Settlement Agreement and its terms;

2. The Court grants preliminary approval and conditional certification of the Class defined as: all persons employed by Defendant in California and classified as non-exempt employees who worked for Defendant during the Class Period (May 28, 2021 through May 13, 2026);

3. The Court grants preliminary approval of the non-reversionary Gross Settlement Amount of \$1,375,000.00;

4. The Court grants preliminary approval of Named Plaintiffs Abdo Alghazali and Rosio Ventura as Class Representatives;

5. The Court grants preliminary approval of Otkupman Law Firm, A Law Corporation and EmpLaw, LLP as Class Counsel;

6. The Court approves the proposed Class Notice (Exhibit "B" to the Declaration of Roman Otkupman) and finds that the proposed method of disseminating the Class Notice constitutes the best notice practicable under the circumstances and complies with due process;

7. The Court grants preliminary approval of ILYM Group, Inc. as Settlement Administrator and payment of settlement administration costs in the amount of \$6,950.00, pursuant to the Administrator's bid;

8. The Court grants preliminary approval of the Service Awards to Named Plaintiffs Abdo Alghazali and Rosio Ventura up to \$12,500.00 each;

9. The Court grants preliminary approval of the payment to Class Counsel of reasonable attorney's fees of up to \$458,333.33 (33 1/3% of the Gross Settlement Amount) and reimbursement of reasonable costs actually incurred in an amount not to exceed \$37,000.00;

10. The Court grants preliminary approval of the PAGA Payment in the amount of \$68,750.00. Sixty-Five percent (65%) of this amount, or \$44,687.50, will be paid to the LWDA. Thirty-Five percent (35%) of this amount, or \$24,062.50, will be paid to the Aggrieved Employees on a pro rata basis;

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1 11. The Court grants the schedule for implementation of the terms of the Settlement
2 Agreement and the Court sets a hearing on Final Approval on 2-25-27 at
3 8³⁰ a.m./p.m. in Department 17.

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5 DATED: 9-15-26


HON. THOMAS S. CLARK
JUDGE OF THE SUPERIOR COURT