

MELMED LAW GROUP P.C.
Jonathan Melmed (SBN 290218)
jm@melmedlaw.com
Maria Burciaga (SBN 334545)
mb@melmedlaw.com
1801 Century Park East, Suite 850
Los Angeles, California 90067
Phone: (310) 824-3828
Fax: (310) 862-6851

Attorneys for Plaintiff CARLOS BARAJAS JR.,
on behalf of himself and others similarly situated

[Additional Counsel listed on the next page]

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

MARIO PABLO, on behalf of himself and
others similarly situated,

Plaintiff,

v.

KEPT COMPANIES, INC. dba VALLEY
FLEET CLEAN; FLEETWASH, INC; and
DOES 1 TO 100,

Defendants.

Case Number: 25STCV09513

**[Proposed] Order Granting Preliminary
Approval of Class Action and PAGA
Settlement**

FILED
Superior Court of California
County of Los Angeles
08/12/2026
David W. Slayton, Executive Officer / Clerk of Court
By: A. He Deputy

LAVI & EBRAHIMIAN, LLP

Joseph Lavi, Esq. (SBN 209776)
jlavi@lelawfirm.com
Vincent C. Granberry, Esq. (SBN 276483)
vgranberry@lelawfirm.com
Paolo Policastro, Esq. (SBN 359731)
ppolicastro@lelawfirm.com
8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
Phone: (310) 432-0000
Fax: (310) 432-0001

Attorneys for Plaintiff MARIO PABLO,
on behalf of himself and others similarly situated

JAMES HAWKINS APLC

James R. Hawkins (SBN 192925)
Isandra Y. Fernandez (SBN 220482)
Lance Dacre (SBN 190305)
9880 Research Drive, Suite 200
Irvine California 92618
Phone: (949) 387-7200
Facsimile: (949) 387-6676
E-mail: james@jameshawkinsaplc.com
isandra@jameshawkinsaplc.com
lance@jameshawkinsaplc.com

Attorneys for Plaintiff MARTIN JOSSUE PEREZ,
on behalf of himself and others similarly situated

1 Plaintiffs' unopposed Motion for Preliminary Approval of a Class Action Settlement came
2 before this Court on August 10, 2026, in Department 1, of the Superior Court of California, County of
3 Los Angeles the Honorable Theresa M. Traber presiding. The Court having considered the papers
4 submitted in support of the Motion and good cause appearing therefore,

5 **IT IS HEREBY ORDERED:**

6 1. The Court grants preliminary approval of the Settlement and the Settlement Class based
7 upon the terms set forth in the Class Action and PAGA Settlement Agreement and Class Notice (the
8 "Settlement Agreement") attached as **Exhibit A** to the Declaration of Maria Burciaga in support of
9 Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and PAGA Settlement. All
10 terms used herein shall have the same meaning as defined in the Settlement Agreement. The settlement
11 set forth in the Settlement Agreement appears to be fair, adequate and reasonable to the Class, and the
12 Court preliminarily approves the terms of the Settlement Agreement, including, without limitation:

- 13 a. A non-reversionary Gross Settlement Amount of **\$1,100,000.00**;
- 14 b. The Class Representative Service Payments to the named Plaintiffs of \$7,500.00
15 each for a total of **\$22,500**;
- 16 c. Court approved attorneys' fees to Class Counsel of up to **\$385,000.00**, representing
17 one-third of the Gross Settlement Amount;
- 18 d. Court approved litigation costs to Class Counsel of up to **\$45,000.00**;
- 19 e. Fees and Costs of the Settlement Administrator of up to **\$15,000.00**; and
- 20 f. An allocation of PAGA penalties of **\$60,000.00**, including payment to the Labor
21 and Workforce Development Agency for its share of 65% of the PAGA penalties
22 pursuant to PAGA in the amount of \$39,000.00 and allocating 35% to the Individual
23 PAGA Payments in the amount of \$21,000.

24 2. This Court has considered the papers in support of the Motion and the Settlement
25 Agreement and finds that pursuant to C.R.C. Rule 3.769(d), the proposed Class should be certified for
26 settlement purposes only. Specifically, the Court finds for settlement purposes only that the proposed
27 Class: (a) is ascertainable; (b) is sufficiently numerous; (c) meets the commonality requirements; (d)
28 the claims of the Class Representatives are typical of the claims of the proposed Class Members; (e)

1 Class Representative's counsel has and is able to adequately represent the proposed Class; (f) the Class
2 Representatives are adequate to represent the Class; and (g) class-wide treatment of this dispute is
3 superior to individual litigation because common issues predominate over individual issues for
4 settlement purposes.

5 3. The Settlement falls within the range of reasonableness and appears to be presumptively
6 valid, subject only to any objections that may be raised at the final fairness hearing and final approval
7 by this Court.

8 4. A final fairness hearing on the question of whether the proposed Settlement, attorneys'
9 fees and costs to Class Counsel, and the Class Representative Service Payments should be finally
10 approved as fair, reasonable and adequate as to the members of the Class is scheduled on the date and
11 time set forth in the implementation schedule in Paragraph 12 below.

12 5. This Court approves, as to form and content, the Notice of Class Action Settlement and
13 Hearing Date for Final Court Approval. The Court approves the procedure for Class Members to
14 participate in, to opt out of, and to object to, the Settlement as set forth in the Settlement Agreement.

15 6. The Court directs the mailing of the Class Notice by first class mail to the Class
16 Members in accordance with the Implementation Schedule set forth below. The Court finds the dates
17 selected for the mailing and distribution of the Notice, as set forth in the Implementation Schedule,
18 meet the requirements of due process and provide the best notice practicable under the circumstances
19 and shall constitute due and sufficient notice to all persons entitled thereto.

20 7. It is ordered that the Settlement Class is preliminarily certified for settlement purposes
21 only.

22 8. The Court preliminary certifies for settlement purposes only the Settlement Class
23 defined as follows: a person employed by Defendants in the State of California and classified as an
24 hourly, non-exempt employee who worked for Defendants during the Class Period. The Class Period
25 is defined as the period of time beginning on April 1, 2021 through January 10, 2026. Defendants have
26 identified 761 Class Members in the Class Period and 50,000 workweeks during the Class Period.

27 9. The Court confirms Plaintiffs Mario Pablo, Carlos Barajas, Jr., and Mario Jossue Perez
28 as Class Representatives, and Melmed Law Group P.C., Lavi & Ebrahimian, LLP, and James R.

Hawkins APLC as Class Counsel.

10. The Court appoints ILYM Group, Inc. as the Settlement Administrator.

11. To facilitate administration of the Settlement pending final approval, the Court hereby enjoins Plaintiff and all Class Members from filing or prosecuting any claims, suits or administrative proceedings (including filing claims with the Division of Labor Standards Enforcement of the California Department of Industrial Relations) regarding claims released by the Settlement, unless and until such Class Members have filed valid Requests for Exclusion with the Settlement Administrator and the time for opting out of the class has elapsed.

12. The Court orders the following **Implementation Schedule** for further proceedings:

a.	Deadline for Defendant to Submit Class Data to Settlement Administrator	[within 30 days after the Preliminary Approval Date]
b.	Deadline for Settlement Administrator to Mail Notice to Class Members	[within 14 days after receiving the Class Data]
c.	Deadline for Class Members to Postmark Requests for Exclusion	[45 days after mailing of the Class Notice]
d.	Deadline for Class Members to submit any Objections to Settlement	[45 days after mailing of the Class Notice]
e.	Deadline for Settlement Administrator to file Declaration of Due Diligence and Proof of Mailing	[14 days prior to Final Approval and Fairness Hearing]
f.	Deadline for Class Counsel to file Motion for Final Approval of Settlement, including Request for Attorneys' Fees, Costs, and Enhancement Award	[16 Court days prior to Final Approval and Fairness Hearing]
g.	Final Approval and Fairness Hearing (the Court's first available date after November 2, 2026)	<u>December 16</u> , 2026 at <u>10:30</u> a.m./ ~~p.m.~~

1 13. If any of the dates in this Implementation Schedule falls on a weekend, bank or court
2 holiday, the time to act shall be extended to the next business day.

3 14. The Court shall retain jurisdiction over the Action for all purposes pursuant to California
4 Rule of Court 3.769 and California Rule of Civil Procedure § 664.6 to enforce the terms of the
5 Settlement.

6 **IT IS SO ORDERED.**

7 Dated: 08/12/2026
8 _____



Honorable Theresa M. Traber
Judge of the Superior Court, County of Los Angeles