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Attorneys for Plaintiff,  
JUAN ORANTES  
and all putative class members

**FILED**  
Superior Court of California  
County of Los Angeles

02/26/2025

David W. Slayton, Executive Officer / Clerk of Court

By: E. Muñoz Deputy

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

JUAN ORANTES, an individual, on behalf of  
himself and all others similarly situated,

Plaintiff,

vs.

LOS ANGELES TIMES  
COMMUNICATIONS LLC, a Delaware  
limited liability company, and DOES 1-50,  
inclusive,

Defendant.

) Case No.: 23STCV20745 (Lead Case)  
) (Consolidated with Case No. 23STCV20782)

**~~PROPOSED~~ ORDER GRANTING  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL**

The Court has before it the Motion for Preliminary Approval brought by Plaintiff JUAN ORANTES in the consolidated actions titled *Juan Orantes v. Los Angeles Times Communications LLC*, (LASC Case No. 23STCV20745, lead case) and *Juan Orantes v. Los Angeles Times Communications LLC* (LASC Case No. 23STCV20782). After reviewing the Motion for Preliminary Approval and the Class Action and PAGA Settlement Agreement ("Settlement Agreement") filed with the Court, and good cause appearing therefor, the Court hereby finds and orders as follows:

**~~PROPOSED~~ ORDER**

1           1.       The Court finds on a preliminary basis that the Settlement memorialized in the  
2 Settlement Agreement appears to be fair, adequate, and reasonable, and therefore meets the  
3 requirements for preliminary approval. The monetary terms of the settlement, detailed in the  
4 following chart, are discussed further below.

Gross Settlement Amount	\$1,160,000
Plaintiffs' Enhancements	-\$10,000
Plaintiffs' Attorney Fees	-\$386,628
Plaintiffs' Costs	-\$20,000
PAGA Payment	-\$50,000
Settlement Administration	-\$12,250
Net Settlement Amount for Distribution to the Class	\$681,122

12           2.       The Court conditionally certifies for settlement purposes only the following class:

14                   All persons who are employed or have been employed by Defendant  
15                   in the State of California at the Olympic Plant as hourly, non-exempt  
16                   employees at any time within the period beginning August 28, 2019,  
17                   and ending on September 11, 2024.

19           3.       The Court finds, for purposes of settlement only, that the Class meets the  
20 requirements for certification under Section 382 of the California Code of Civil Procedure in that:  
21 (1) the Class is so numerous that joinder is impracticable; (2) there are questions of law and fact  
22 that are common, or of general interest, to all Settlement Class Members, which predominate over  
23 individual issues; (3) the named Plaintiff's claims are typical of the claims of the Class; (4) the  
24 named Plaintiff and Plaintiff's counsel will fairly and adequately protect the interests of the Class;  
25 and (5) a class action is superior to other available methods for the fair and efficient adjudication  
26 of the controversy.  
27  
28

1           4.     The Court appoints for settlement purposes only JUAN ORANTES as Class  
2 Representatives. The enhancement award of \$10,000 to Plaintiff is conditionally approved and  
3 will be determined at final approval.

4           5.     The Court appoints for settlement purposes only Koul Law Firm, APC, as Class  
5 Counsel. The proposed payment to Class Counsel for reasonable attorneys' fees is an amount not  
6 to exceed thirty-three and one-third percent (33 1/3%) of the Gross Settlement Amount (\$386,628),  
7 which will be determined at final approval. The proposed payment to Class Counsel for Litigation  
8 Costs in an amount not to exceed \$20,000.00 is conditionally approved and will be determined at  
9 final approval.

10          6.     The Court appoints ILYM Group, Inc. as the Settlement Administrator. The  
11 proposed payment of the Settlement Administration Costs in an amount not to exceed \$12,250 to  
12 ILYM for its services is conditionally approved and will be determined at final approval.

13          7.     The Parties are ordered to carry out the Settlement according to the terms of the  
14 Settlement Agreement.

15          8.     The Court orders the following implementation schedule:

16           a.     Deadline for Defendant to submit Class Data to the Settlement Administrator:  
17 within fourteen (14) days after entry of the Preliminary Approval Order;

18           b.     Deadline for Settlement Administrator to mail the Notice to Class Members: Within  
19 twenty-one (21) days after entry of the Preliminary Approval Order;

20           c.     Deadline for Class Members to postmark written objections, challenges to Class  
21 Workweeks and/or PAGA Pay Periods, and Requests for Exclusion (Opt-Out) related to the  
22 Settlement: Within forty-five (45) days for initial mailing of Notice Packet; to be extended by  
23 fourteen (14) days for remailing;

24           d.     Deadline for serving and filing Motion for Final Approval, Attorneys' Fees Award,  
25 Cost Award, and Class Representative Enhancement Payment: Sixteen (16) court days before the  
26 Final Approval Hearing in conformity with Code of Civil Procedure section 1005;

27           e.     Final Approval Hearing: 1:00 PM at 9:00 a.m./~~p.m.~~  
28

1           9.       The Court approves as to form and content the Notice included as Exhibit A to the  
2 Settlement Agreement, which advises Class Members and PAGA Aggrieved Employees of the  
3 Settlement terms, the preliminary approval of the Settlement, and the scheduling of the Final  
4 Approval Hearing.

5           10.     The Court finds that the timing for the mailing and distribution of the Notice meet  
6 the requirements of due process, provide the best notice practicable under the circumstances, and  
7 constitute due and sufficient notice to all persons entitled thereto. The Court directs the mailing  
8 of the Notice to all identified Class Members in accordance with the Settlement Agreement.


9           11.     The Notice is hereby found to be the best means practicable of providing notice  
10 under the circumstances, and, when completed, shall constitute due and sufficient notice of the  
11 class and representative actions, proposed Settlement, and the Final Approval Hearing to all  
12 persons affected by and/or authorized to participate in the Settlement, in full compliance with due  
13 process and the notice requirements of California Code of Civil Procedure section 877.6.

14           12.     The Court retains jurisdiction to consider all further applications arising out of or  
15 in connection with the Settlement.

16           13.     If the Settlement does not become effective in accordance with the terms of the  
17 Settlement Agreement, or if the Settlement is not finally approved, or is terminated, canceled, or  
18 fails to become effective for any reason, this Order shall be rendered null and void and shall be  
19 vacated.  
20

21                               IT IS SO ORDERED.

22  
23 Dated:    02/26/2025

  
\_\_\_\_\_  
HON. WILLIAM F. HIGHBERGER  
JUDGE OF THE SUPERIOR COURT

**PROOF OF SERVICE**

**Case No. 23STCV20745**  
**Consolidated Case No. 23STCV20782**  
***Orantes v. Los Angeles Times Communications, LLC***

I, NADIA CHAVEZ declare that I am a resident of or employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the entitled case. The name and address of my residence or business is KOUL LAW FIRM, 3435 Wilshire Blvd. Ste. 1710, Los Angeles, California 90010.

On October 14, 2024, I served the foregoing document described as:

- 1. PLAINTIFF'S NOTICE OF MOTION FOR: (1) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT (2) APPROVAL OF NOTICE TO CLASS MEMBERS (3) APPROVAL OF SETTLEMENT ADMINISTRATOR; AND (4) SETTING HEARING FOR FINAL APPROVAL OF SETTLEMENT;**
- 2. PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR: (1) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT (2) APPROVAL OF NOTICE TO CLASS MEMBERS (3) APPROVAL OF SETTLEMENT ADMINISTRATOR; AND (4) SETTING HEARING FOR FINAL APPROVAL OF SETTLEMENT;**
- 3. DECLARATION OF NAZO KOULLOUKIAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AGREEMENT;**
- 4. DECLARATION OF PLAINTIFF JUAN ORANTES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION APPROVAL;**
- 5. [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL;**
- 6. DECLARATION OF LISA MULLINS**

  X  

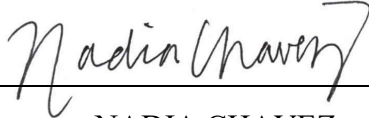
**BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address from e-mail nadia@koullaw.com pursuant to California Rules of Court. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**SEE ATTACHED SERVICE LIST**

on the interested parties in this action by sending [   ] the original [or] [✓] a true copy thereof [✓] to interested parties as follows [or] [   ] as stated on the attached service list:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this October 14, 2024, in Los Angeles, California.

  
\_\_\_\_\_  
NADIA CHAVEZ

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**Attorneys for Defendant, Los Angeles Times Communications, LLC**