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Superior Court of California
County of Los Angeles

08/12/2025

David W. Slayton, Executive Officer / Clerk of Court

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Attorneys for Plaintiff,
HECTOR LEON,
and all putative class members

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

HECTOR LEON, an individual, on behalf of
himself and all others similarly situated,
Plaintiff,

vs.

INSURANCE AUTO AUCTIONS, INC., an
Illinois Corporation, and DOES 1-50,
inclusive,
Defendant.

) Class Case No.: 24STCV07933
) PAGA Case No.: 24STCV13338
) Assigned to The David S. Cunningham III,
) Dept. 11

**[REVISED PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL**

1 The Court has before it the Motion for Preliminary Approval brought by Plaintiff HECTOR
2 LEON ("Plaintiff"). After reviewing the Motion for Preliminary Approval and the Class Action
3 and PAGA Settlement Agreement and Class Notice ("Settlement Agreement") between Plaintiff
4 and Defendant INSURANCE AUTO AUCTIONS, INC. ("Defendant") and filed with the Court,
5 and good cause appearing therefor, the Court hereby finds and orders as follows:

6 1. The Court finds on a preliminary basis that the Settlement memorialized in the
7 Settlement Agreement appears to be fair, adequate, and reasonable, and therefore meets the
8 requirements for preliminary approval.

9 2. The Court conditionally certifies for settlement purposes only the following class:
10 All current and former hourly, non-exempt employees of
11 Defendant in California, at any time from March 28, 2020, to April
12 21, 2025.

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

22 4. The Court appoints for settlement purposes only Plaintiff Hector Leon as Class
23 Representative. An enhancement award of \$7,500 to Plaintiff is conditionally approved and will
24 be determined at final approval.

25 5. The Court appoints for settlement purposes only Koul Law Firm, APC, and
26 Majarian Law Group, APC, as Class Counsel. The proposed payment to Class Counsel for
27 reasonable attorneys' fees is an amount not to exceed thirty-three and one-third percent (33.33%)
28 of the Gross Settlement Amount (\$499,950), which will be determined at final approval. The

1 proposed payment to Class Counsel for Litigation Costs in the amount not to exceed \$30,000 is
2 conditionally approved and will be determined at final approval.

3 6. The Court appoints ILYM Group, Inc. as the Settlement Administrator. The
4 proposed payment of the Settlement Administration Costs in an amount not to exceed \$10,550 to
5 ILYM for its services is conditionally approved and will be determined at final approval.

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

8 8. The Court orders the following implementation schedule:

9 a. Deadline for Defendant to submit Class Data to the Settlement Administrator:
10 within twenty one (21) days after entry of the Preliminary Approval Order;

11 b. Deadline for Settlement Administrator to mail the Notice to Class Members: Within
12 fourteen (14) days of receipt of Class Data;

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

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

20 e. Final Approval Hearing: 3/25/26, ~~2025~~ at 10:00 a.m./~~p.m.~~

21 9. The Court approves as to form and content the [Amended] Court Approved Notice
22 of Class Action Settlement and Hearing Date for Final Court Approval ("Notice"), which advises
23 Class Members and PAGA Settlement Group Members of the Settlement terms, the preliminary
24 approval of the Settlement, and the scheduling of the Final Approval Hearing.

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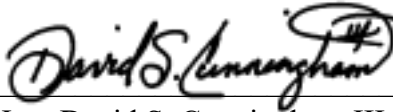
1 constitute due and sufficient notice to all persons entitled thereto. The Court directs the mailing
2 of the Notice to all identified Class Members in accordance with the Settlement Agreement.

3 11. The Court retains jurisdiction to consider all further applications arising out of or
4 in connection with the Settlement.

5 12. If the Settlement does not become effective in accordance with the terms of the
6 Settlement Agreement, or if the Settlement is not finally approved, or is terminated, canceled, or
7 fails to become effective for any reason, this Order shall be rendered null and void and shall be
8 vacated.

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10 IT IS SO ORDERED.

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12 Dated: 08/12/2025

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14 The Hon. David S. Cunningham III
15 JUDGE OF THE SUPERIOR COURT
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PROOF OF SERVICE
Case No. 24STCV07933

Leon v. Insurance Auto Auctions, Inc.

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, 217 South Kenwood Street, Glendale, California 91205.

On August 1, 2025, I served the foregoing document described as:

- 1. SUPPLEMENTAL DECLARATION OF NAZO KOULLOUKIAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AGREEMENT;**
- 2. [REVISED PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL;**
- 3. DECLARATION OF NICOLE BENCH**

X

BY E-MAIL: I hereby certify that this document was served from Glendale, 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

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:

Michael W. Droke
Marina Lyons
Hannah Talmage
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Attorneys for Defendant INSURANCE AUTO AUCTIONS, INC.

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

Executed on this August 1, 2025, in Glendale, California.



NADIA CHAVEZ

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