

Electronically Filed
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Superior Court of California
County of Stanislaus
Hugh K. Swift
Clerk of the Court
By: Cynthia Hurtado, Deputy

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JAVANNA RODRIGUEZ
and all putative class members

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF STANISLAUS

JAVANNA RODRIGUEZ, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

LA PARRILLA, INC., a California
corporation, and DOES 1-50, inclusive,

Defendant.

Case No.: CV-25-002051

~~PROPOSED~~ **AMENDED ORDER
GRANTING MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AND APPROVING
ADDENDUM NO. 1 TO JOINT CLASS
ACTION AND PAGA SETTLEMENT
AGREEMENT**

Class Action Filed: March 4, 2025
FAC Filed: April 24, 2025

The Court has before it Plaintiff Javanna Rodriguez's Motion for Preliminary Approval, the Joint Class Action and PAGA Settlement Agreement and Class Notice filed with the Court, and the Parties' Addendum No. 1 dated September 28, 2026, ("Addendum"). After reviewing the Motion for Preliminary Approval, the Settlement Agreement, the Addendum, and the papers filed in support thereof, and good cause appearing therefor, the Court hereby finds and orders as follows:

1 1. The Court finds on a preliminary basis that the settlement memorialized in the
2 Settlement Agreement, as amended by Addendum No. 1, appears to be fair, adequate, and
3 reasonable, and therefore meets the requirements for preliminary approval. The Court therefore
4 grants preliminary approval of the Settlement Agreement, as amended by Addendum No. 1. The
5 monetary terms of the settlement, as amended, are discussed further below.

Maximum Settlement Amount	\$592,397.85
Plaintiff's Class Representative Award	(\$10,000.00)
Plaintiff's Attorney Fees (up to 35%)	(\$197,446.20)
Plaintiff's Litigation Costs (up to)	(\$25,000.00)
PAGA Payment	(\$50,000.00)
Settlement Administration (up to)	(\$12,000.00)
Net Settlement Amount for Distribution to Class Members	\$297,951.65

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16 2. The Court further finds that, after Defendant submitted the Class Data to the
17 Settlement Administrator, the Settlement Administrator determined that the applicable escalator
18 clause was triggered. Defendant has elected to pay the additional amount required by the escalator
19 clause. Accordingly, the Gross Settlement Amount is increased by \$92,397.85, from \$500,000.00
20 to \$592,397.85.

21 3. The Court approves the Addendum, which amends the Settlement Agreement to
22 reflect the amended funding structure, permitting Defendant an additional six months to fully fund
23 the settlement. The Court finds that the Addendum does not otherwise materially alter the terms
24 preliminarily approved by the Court except as expressly stated in this Amended Order and the
25 Addendum.

26 4. “Class” means all current or former hourly paid or non-exempt employees of
27 Defendant in California employed by Defendant La Parrilla, Inc., from March 4, 2021 through
28 July 16, 2026, the date this Court granted preliminary approval.

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

9 6. The Court appoints for settlement purposes only JAVANNA RODRIGUEZ as the
10 Class Representative. A Class Representative Award of \$10,000.00 to Plaintiff is conditionally
11 approved and will be determined at final approval.

12 7. The Court appoints for settlement purposes only Koul Law Firm, APC as Class
13 Counsel. The proposed payment to Class Counsel for reasonable attorneys' fees is an amount not
14 to exceed 35% of the Maximum Settlement Amount, which will be determined at final approval.
15 The proposed payment to Class Counsel for actual Litigation Costs in an amount not to exceed
16 \$25,000.00 is conditionally approved and will be determined at final approval.

17 8. The Court appoints ILYM Group, Inc. as the Settlement Administrator. The
18 proposed payment of the Settlement Administration Costs in an amount not to exceed \$12,000.00
19 to ILYM Group, Inc. for its services is conditionally approved and will be determined at final
20 approval.

21 9. The Parties are ordered to carry out the Settlement according to the terms of the
22 Settlement Agreement, as amended by the Addendum.

23 10. The Court orders the following implementation schedule:

24 a. Deadline for Defendant to submit Class Data to the Settlement Administrator:
25 within thirty (30) calendar days after entry of the Preliminary Approval Order;
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1 b. Deadline for Settlement Administrator to send Class Notice to Class Members
2 providing notice of settlement: within fourteen (14) calendar days of receipt of this Amended
3 Order.

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

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

11 e. Final Approval Hearing: December 18, 2026 at 8:30 a.m.

12 11. The Court approves as to form and content the Notice included as Exhibit A to
13 Addendum No. 1, which will be mailed in both English and Spanish and advises Class Members
14 and PAGA Members of the Settlement terms, the preliminary approval of the Settlement, and the
15 scheduling of the Final Approval Hearing.

16 12. The Court finds that the timing for the mailing and distribution of the Notice meets
17 the requirements of due process, provides the best notice practicable under the circumstances, and
18 constitute due and sufficient notice to all persons entitled thereto. The Court directs the mailing
19 of the Notice to all identified Class Members in accordance with the Settlement Agreement.

20 13. Except as expressly amended by this Amended Order and the Addendum, all
21 findings, approvals, appointments, deadlines, and directives in the Court's prior Order Granting
22 Motion for Preliminary Approval of Class and Representative Action Settlement remain
23 unchanged and in full force and effect.

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

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