



FILED
San Francisco County Superior Court

JAN 13 2026

CLERK OF THE COURT
BY: *[Signature]*
Deputy Clerk

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO

JONATHAN TAI DONG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

FREENOME HOLDINGS, INC.;
PROCLINICAL STAFFING, INC.; and DOES
1-10, inclusive,

Defendants.

Case No. CGC-24-613979

ORDER GRANTING PLAINTIFF'S
RENEWED MOTION FOR
PRELIMINARY APPROVAL

Before the court is an unopposed renewed motion by plaintiff Jonathan Tai Dong for preliminary approval of the settlement of wage-and-hour claims, including a claim under PAGA, reached with defendants Freenome Holdings, Inc. and Proclinical Staffing, Inc. On December 16, 2025, the court issued an order requesting supplemental briefing due on January 2, 2026 and continued the hearing to January 14, 2026. On January 2, 2026 and January 8, 2026, the parties filed their supplemental briefing. The motion was scheduled for hearing on January 14, 2026, at 2:00 p.m. in Department 613, the Honorable Jeffrey S. Ross presiding. The court determines that this matter can be decided without hearing. **IT IS HEREBY ORDERED** that the court **VACATES** the January 14, 2026, hearing, **GRANTS** the renewed motion for preliminary approval of the Amended Class Action and PAGA Settlement Agreement ("settlement agreement") attached to this order as **Exhibit 1**, a final approval hearing is **RESERVED** for **June 12, 2026, at 9:00 a.m.**, and the court otherwise **ORDERS** as follows:

1 1. Except as otherwise specified here, the court adopts and incorporates by reference the
2 terms and definitions of the settlement agreement.

3 2. The following Settlement Class is conditionally certified for settlement purposes (SA,
4 § 1.5): *all current and former non-exempt employees who are/were employed by Proclinical, and placed*
5 *to work at Freenome, a third-party client of Proclinical, in the State of California from April 16, 2020*
6 *through May 31, 2025.*

7 3. The aggrieved employees are “all current and former non-exempt employees who are/were
8 employed by Proclinical, and placed to work at Freenome, a third-party client of Proclinical, in the State
9 of California from April 14, 2023 through May 31, 2025.” (SA, § 1.4.)

10 4. The court finds that the Settlement Class meets the requirements for certification under
11 Code of Civil Procedure section 382 because: (1) the proposed Settlement Class is numerous and
12 ascertainable; (2) there are predominant common questions of law or fact; (3) Dong’s claims are typical of
13 the claims of the members of the proposed Settlement Class; and (4) a class action is superior to other
14 methods to efficiently adjudicate this controversy.

15 5. The court has considered the *Dunk/Kullar* factors and preliminarily approves the
16 settlement because it appears to be within the range of possible final approval as a fair, adequate, and
17 reasonable settlement.

18 6. For settlement purposes only, Jonathan Tai Dong is appointed as class representative. The
19 court preliminarily finds he will adequately represent the Settlement Class for settlement purposes.

20 7. For settlement purposes only, Moon Law Group, PC is appointed as Class Counsel. The
21 court preliminarily finds that Class Counsel will fairly and adequately represent the Settlement Class for
22 settlement purposes.

23 8. ILYM Group, Inc. is appointed as settlement administrator. ILYM Group, Inc. shall carry
24 out all of the duties and responsibilities as set forth in the settlement agreement and this order, including,
25 inter alia, the provision of notice to the Settlement Class.

26 9. The court approves the proposed form of notice attached to this order as **Exhibit 2**. The
27 court finds that distribution of the approved notice in accordance with the plan set forth in the settlement
28

1 agreement (a) constitutes the best notice practicable under the circumstances, (b) constitutes valid, due,
2 and sufficient notice to all members of the Settlement Class, and (c) complies fully with the requirements
3 of California Code of Civil Procedure section 382 and California Rules of Court 3.766 and 3.769.

4 10. On **June 12, 2026, at 9:00 a.m.**, in Department 613 this court will hold a final approval
5 hearing to determine whether the settlement agreement should be finally approved as fair, reasonable, and
6 adequate as well as the attorney's fees, costs, and service award that should be approved. All briefing and
7 evidence for the motion for final approval and the motion for attorney's fees, costs, and service awards
8 shall be filed no later than **May 11, 2026**, with two paper courtesy copies of all briefing and evidence
9 promptly delivered to Department 613. Electronic courtesy copies of the proposed order and proposed
10 final form of judgment (in Word format) shall be delivered to the Department 613 email inbox
11 contemporaneously with e-filing. Class Counsel shall promptly inform the court of contemplated
12 appearances by members of the Settlement Class, including whether an interpreter is needed. The court
13 may change the date or time of the final approval hearing without further notice to the Settlement Class.

14 11. The court sets the following administration deadlines in light of the terms of the settlement
15 agreement.

Event	Deadline
Defendant Proclinal to Provide Class Data to ILYM Group, Inc.	21 days from preliminary approval. (SA, § 4.2): February 3, 2026
ILYM Group, Inc. to Distribute Notice	14 days from receipt of Class Data. (SA, § 7.4.2): February 17, 2026 (at the very latest)
Deadline for Exclusions and Objections	60 days from initial mailing of class notice (SA, §§ 1.43, 7.4.4, 7.5.1, 7.7.2): April 20, 2026 (due to deadline falling on weekend) (postmark deadline)
Filing of Motion for Final Approval and Motion for Attorney's Fees, Costs, and Service Award	May 11, 2026
Final Approval Hearing	June 12, 2026, at 9:00 a.m. in Dept. 613

