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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

HALEY HALKIAS, Individually and on
Behalf of All Others Similarly Situated, and
as an Aggrieved Employee,

Plaintiff,

vs.

RIVETS AMERICAN GRILL, INC., a
California Corporation d/b/a Rivets
American Grill, 4R CLOVER, INC., a
California Corporation d/b/a P. Wexford's
Pub, TRIPLE R WAGNER, INC., a
California Corporation d/b/a The Boardroom,
R WAGNER ENTERPRISES, INC., a
California Corporation d/b/a Nino's Place,
CENTRAL PRO CLEANERS, INC., a
California Corporation d/b/a The Taco Shop,
4R RESTAURANTS, INC., a California
Corporation d/b/a Valley Inn, CENTRALCA
RESTAURANTS, INC., a California
Corporation d/b/a Retro, ROMAN T.
WAGNER, an individual, and DOES 1
through 25, inclusive,

Defendants.

Case No. CV-24-009764
COMPLEX CASE (CLASS ACTION)

ASSIGNED FOR ALL PURPOSES TO:
Judge: Hon. Clifford H. Tong
Dept: 23

~~[PROPOSED]~~ ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

Hearing Date: July 10, 2026
Time: 8:30 a.m.

Complaint Filed: November 27, 2024
Trial Date: None Set

1 This matter came for hearing on July 10, 2026 at 8:30 a.m. regarding Plaintiff Haley Halkias’
2 (“Plaintiff”) Motion for Preliminary Approval of Class Settlement (“Motion”). Having reviewed the
3 Motion, the Declaration of Taylor B. Graham, the Class Action and PAGA Settlement Agreement
4 and Class Notice (“Settlement Agreement”), and the entire record in this matter, and good cause
5 appearing, the Court hereby finds and orders as follows:

6 1. The Court finds on a preliminary basis that the Settlement Agreement appears to be
7 fair, adequate, and reasonable and therefore meets the requirements for preliminary approval. The
8 Court grants preliminary approval of the Settlement and Settlement Class based upon the terms set
9 forth in the Settlement Agreement between Plaintiff and Rivets American Grill, Inc., 4R Clover, Inc.,
10 Triple R Wagner, Inc., R Wagner Enterprises, Inc., Central Pro Cleaners, Inc., 4R Restaurants, Inc.,
11 CentralCA Restaurants, Inc., and Roman Wagner (collectively, the “Defendants”), which is attached
12 as “**EXHIBIT 1**” to the Declaration of Taylor B. Graham, Esq. in Support of Plaintiff’s Motion for
13 Preliminary Approval of Class Action Settlement.

14 2. The Settlement falls within the range of reasonableness of a settlement which could
15 ultimately be given final approval by this Court, and appears to be presumptively valid, subject only
16 to any objections that may be raised at the Final Approval Hearing. The Court notes that Defendants
17 have agreed to payment of a gross settlement amount of \$185,000.00 to cover (a) settlement
18 payments to class members who do not validly opt-out; (b) a \$6,500.00 payment to the State of
19 California, Labor & Workforce Development Agency for its share of the \$10,000.00 allocated as
20 penalties under the Private Attorneys General Act; (c) \$3,500.00 to be paid to the aggrieved
21 employees for their share of the \$10,000.00 allocated as penalties under the Private Attorneys
22 General Act; (d) a \$5,000.00 Class Representative Service Payment to the Named Plaintiff; (e) Class
23 Counsel’s attorneys’ fees, not to exceed 33-1/3% of the Gross Settlement Amount (\$61,666.67), and
24 reimbursement of actual litigation expenses incurred by Class Counsel, in the amount of \$2,917.88;
25 (f) Settlement Administration Costs not to exceed \$7,650.00; and (g) the employer’s share of the
26 payroll taxes for the wage portion of the net settlement amount.

27 3. The Court preliminarily finds that the terms of the Settlement appear to be within the
28 range of possible approval, pursuant to California Code of Civil Procedure § 382 and applicable law.

1 The Court finds on a preliminary basis that: (a) the settlement amount is fair and reasonable to the
2 class members when balanced against the probable outcome of further litigation relating to class
3 certification, liability and damages issues, and potential appeals; (b) significant informal discovery,
4 investigation, and research have been conducted such that counsel for the parties at this time are able
5 to reasonably evaluate their respective positions; (c) settlement at this time will avoid substantial
6 costs, delays, and risks that would be presented by the further prosecution of the litigation; and (d)
7 the proposed settlement has been reached as a result of intensive, serious, and non-collusive
8 negotiations between the parties with the assistance of a well-respected class action mediator.
9 Accordingly, the Court preliminarily finds that the Settlement Agreement was entered into in good
10 faith.

11 4. A final fairness hearing on the question of whether the proposed Settlement, including
12 attorneys' fees and costs to Class Counsel, should be finally approved as fair, reasonable and
13 adequate to the class members is hereby set in accordance with the Implementation Schedule set
14 forth below.

15 5. The Court provisionally certifies for settlement purposes only the following class:
16 (the "Settlement Class"): "All non-exempt employees who are or were employed by Defendants in
17 California during the period from April 4, 2021 to the date of the Court's order granting preliminary
18 approval."

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

7. The Court appoints, for settlement purposes only, Plaintiff Haley Halkias as Class Representative and approves a Class Representative Service Payment not to exceed \$5,000.00 to the Named Plaintiff, for initiating the Action and providing services in support of the Action.

8. The Court appoints, for settlement purposes only, Pelton Graham LLP, as Class Counsel. The Court further preliminarily approves Class Counsel's ability to request attorneys' fees of up to one-third of the Gross Settlement Amount (\$61,666.67), and costs of \$2,917.88.

9. The Court appoints ILYM Group, Inc. as the Settlement Administrator with reasonable administration costs not to exceed \$7,650.00.

10. The Court approves, as to form and content, the Class Notice, attached as "**Exhibit A**" to the Settlement Agreement (the "Class Notice"), modified as required by the Court's July 9, 2026 tentative ruling. The Court finds on a preliminary basis that the plan for distribution of the Class Notice to Settlement Class Members satisfies due process, provides the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons entitled thereto.

11. The parties are ordered to carry out the Settlement according to the terms of the Settlement Agreement.

12. Any Class Member who does not timely and validly request exclusion from the settlement may object to the Settlement Agreement. Objections do not have to be in writing but can instead be made in person.

13. The Court orders the following Implementation Schedule:

Defendants to provide Class Data to the Settlement Administrator	August 10, 2026
Settlement Administrator to mail Class Notice	August 24, 2026
Requests for Exclusion/Deadline to Object/Deadline to Challenge Workweeks and/or Pay Periods	October 23, 2026

Deadline for Class Counsel to file Motion for Final Approval and Request for Attorneys' Fees and Costs	May 14, 2027
Deadline for Settlement Administrator to Provide Class Counsel with Declaration of Due Diligence	November 6, 2026
Final Approval and Fairness Hearing	June 8, 2027 at 8:30 a.m., in Department 23. The hearing may be continued to another date without further notice to the Class Members

14. The Court ORDERS that, pending further order of this Court, all proceedings in this lawsuit, except those contemplated herein and in the settlement, are stayed.

IT IS SO ORDERED.

DATE: 7/16/2026



Hon. Clifford H. Tong
Stanislaus County Superior Court

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On July 14, 2026, I served true copies of the foregoing document(s) described as:

on the interested parties in this action, as follows:

Attorneys for Defendants

[X] (State): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

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Taylor B. Graham, Esq.