

AEGIS LAW FIRM, PC
SAMUEL A. WONG, STATE BAR NO. 217104
KASHIF HAQUE, STATE BAR NO. 218672
JESSICA L. CAMPBELL, STATE BAR NO. 280626
JULIA M. TOSCANO, BAR NO. 326272
9811 IRVINE CENTER DRIVE, SUITE 100
IRVINE, CALIFORNIA 92618
TELEPHONE: (949) 379-6250
FACSIMILE: (949) 379-6251
EMAIL: JTOSCANO@AEGISLAWFIRM.COM

ATTORNEYS FOR PLAINTIFF JERMAINE LEE KEYS, INDIVIDUALLY,
AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED.

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

JERMAINE LEE KEYS, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

FLORY INDUSTRIES; and DOES 1 through
20, inclusive,

Defendants.

Case No. CV-23-003252

*Assigned for All Purposes to:
Judge Sonny Sandhu
Dept. 24*

**~~PROPOSED~~ ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 11, 2025
Time: 8:30 a.m.
Dept: 24

1 APPEARANCES:

2 JULIA TOSCANO, Esq. present via VCourt, on behalf of JERMAINE LEE KEYS

3 No appearance by Defendant(s)/Respondent(s). This matter is regularly called for hearing.

4 There being no request for hearing the Court confirms the tentative ruling with
5 modifications as follows:

6 Plaintiff's Motion for Preliminary Approval of Class and Representative Action
7 Settlement – GRANTED, unopposed.

8 Good cause appearing to the satisfaction of the Court, the class is certified for settlement
9 purposes only in accordance with Cal. Rules of Ct., rule 3.769(c).

10 The Court finds the proposed settlement is within the range of reasonableness and deemed
11 to be presumptively valid, subject to final approval by this Court. and to any objections that may
12 be heard at the final fairness hearing.

13 The class counsel, class representative and claims administrator are hereby preliminarily
14 approved and appointed as set forth in the motion. The Court sets the following deadlines relative
15 to this matter:

16 7-3-25 Defendant shall provide Class Information to Administrator

17 7-21-25 Administrator shall mail Class Notice to Class Members.

18 9-29-25 Class Deadline for Requests for Exclusion and for Submission of Objections to
19 Settlement

20 10-20-25 Deadline for Class Counsel to file Motion for Final Approval and submit due
21 diligence declaration from Administrator

22 10-29-25 Deadline for filing any written opposition to Plaintiff's Motion for Final
23 Approval of Settlement or any response to an objection to the Settlement,

24 11-4-25 Deadline for filing any written Reply to Opposition to Motion for Final Approval
25 of Settlement

26 A final approval hearing in this matter shall be set for **November 12, 2025, at 8:30 a.m.**
27 **in Department 24** of this Court. The Class Notice shall be revised to reflect the date of the final
28 approval hearing and the corresponding deadlines.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Plaintiff to give notice.

DATED: 6/27/2025



Honorable Sonny Sandhu
JUDGE OF THE SUPERIOR COURT

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, am employed in the County of Orange, State of California. I am over
3 the age of 18 and not a party to the within action; am employed with Aegis Law Firm PC and
my business address is 9811 Irvine Center Drive, Suite 100, Irvine, California 92618.

4 On June 17, 2025, I served the foregoing document(s) entitled:

- 5 • **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF**
6 **CLASS ACTION SETTLEMENT**

7 on all the appearing and/or interested parties in this action by delivering ☐
8 the original ☒ a true copy thereof on the party(ies) addressed below as
follows:

9 John H. Adams
10 Jessica Hughey
11 **LITTLER**
12 500 Capitol Mall, Suite 2000
13 Sacramento, CA 95814
14 jhadams@littler.com
jjhughey@littler.com

Attorneys for Defendant:
FLORY INDUSTRIES

15 ☐ **(BY MAIL)** I am readily familiar with the firm's practice of collection and processing
16 correspondence for mailing. Under that practice it would be deposited with the U.S.
17 Postal Service on that same day with postage thereon fully prepaid at Irvine, California
18 in the ordinary course of business. I am aware that on motion of the party served, service
is presumed invalid if postage cancellation date or postage meter date is more than one
day after date of deposit for mailing this affidavit. (*Cal Code Civ. Proc.* § 1013(a); *Fed.*
R. Civ. Proc. 5(a); *Fed. R. Civ. Proc.* 5(c).)

19 ☐ **(BY OVERNIGHT MAIL)** I am personally and readily familiar with the business
20 practice of Aegis Law Firm PC for collection and processing correspondence for
21 overnight delivery, and I caused such document(s) described herein to be deposited for
delivery to a facility regularly maintained Federal Express for overnight delivery. (*Cal*
Code Civ. Proc. § 1013(c); *Fed. R. Civ. Proc.* 5(c).)

22 ☒ **(BY ELECTRONIC TRANSMISSION)** I caused said document(s) to be served via
23 electronic transmission via the above listed email addresses on the date below. (*Cal.*
Code Civ. Proc. § 1010.6(6); *Fed. R. Civ. Proc.* 5(b)(2)(E); *Fed. R. Civ. Proc.* 5(b)(3).)

24 ☐ **(BY PERSONAL SERVICE)** I delivered the foregoing document by hand delivery to
25 the addressed named above. (*Cal Code Civ. Proc.* § 1011; *Fed. R. Civ. Proc.*
26 5(b)(2)(A).)

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

3 Executed on June 17, 2025, at Irvine, California.

4 Laila Shams

5 Laila Shams
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28