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Class
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Following Page)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN**

JESUS ANDRADE, MICHAEL
HERNANDEZ, individually, on behalf of
themselves, all others similarly situated,
and the general public,

Plaintiffs,

v.

MMM CONSUMER BRANDS INC., a
New York corporation, and DOES 1
through 100, Inclusive,

Defendants.

CASE NO. STK-CV-UOE-2023-9352
[Assigned for All Purposes to the Hon. Blanca
Banuelos, Department 10B]

CLASS ACTION

~~[PROPOSED]~~ ORDER GRANTING MOTION
FOR ORDER PROVISIONALLY
CERTIFYING SETTLEMENT CLASS AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT

[FILED CONCURRENTLY WITH NOTICE OF
MOTION AND MOTION FOR ORDER
PROVISIONALLY CERTIFYING SETTLEMENT
CLASS AND PRELIMINARILY APPROVING
CLASS ACTION SETTLEMENT; AND
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF;
DECLARATIONS OF MICHAEL H.
BOYAMIAN, MEHRDAD BOKHOUR]

Complaint Filed: August 19, 2023
Trial Date: None Set

Hearing
Date: TBD
Time:
Dept. 10B

Filed JUL 10 2025
STEPHANIE BOHRER, CLERK
By [Signature]
DEPUTY

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ORDER

Having considered Plaintiffs Jesus Andrade's and Michael Hernandez's ("Plaintiffs") Motion for Order Provisionally Certifying Settlement Class and Preliminary Approving of Class Action Settlement ("Motion"), the declarations and exhibits thereto, and having found good cause for the issuance of an Order, the Court orders as follows:

NOW THEREFORE, IT IS HEREBY ORDERED:

1. This Order incorporates by reference the definitions in the Memorandum of Understanding executed on January 23, 2025 ("MOU"), and all terms defined therein shall have the same meaning as set forth in the MOU.

2. The Settlement Class shall be conditionally certified for settlement purposes only and shall consist of:

- o All hourly, non-exempt Warehouse Employees (including, but not limited to, the titles of "warehouse associate", "production associate", or other similarly situated titles/positions) who are or have been employed by Defendant in the State of California at any time from August 30, 2019 and September 30, 2024.

3. The Settlement entered into among the Parties and their counsel, is preliminarily approved as it appears to be proper, to fall within the range of reasonableness, to be the product of arm's-length and informed negotiations, to treat all Class Members fairly, and to be presumptively

1 valid, subject to any objections that may be raised at or before the final approval hearing. Plaintiff
2 has provided the Court with enough information about the nature and magnitude of the claims
3 being settled, as well as the impediments to recovery, to make an independent assessment of the
4 reasonableness of the terms to which the Parties have agreed.

5 4. The Court conditionally finds, for purposes of approving this settlement only, the
6 proposed Class meets the requirements for certification under section 382 of the California Code of
7 Civil Procedure: (a) the proposed Class is ascertainable and so numerous joinder of all members of
8 the Class is impracticable; (b) there are questions of law or fact common to the proposed Class, and
9 a well-defined community of interest among members of the proposed Class with respect to the
10 subject matter of the class action; (c) the claims of the Class Representatives are typical of the
11 claims of the members of the proposed Class; (d) the Class Representatives have and will fairly and
12 adequately protect the interests of the Members of the Class; (e) a class action is superior to other
13 available methods for an efficient adjudication of this controversy in the context of settlement; and
14 (f) counsel of record for the Class Representatives are qualified to serve as counsel in-dividually
15 and in the capacity of Class Representative.

16 5. The Court approves, as to form and content, the proposed Notice of Class Action
17 Settlement ("Notice Packet") attached as Exhibit B to the Declaration of Michael Boyamian.

18 6. The Court directs the mailing, by first-class regular U.S. mail, of the Notice Packet
19 in accordance with the schedule set forth below and the procedures described in the Motion. The
20 Court finds that the method selected for communicating the preliminary approval of the
21 Settlement Agreement to Class Members is the best notice practicable under the circumstances,
22 constitutes due and sufficient notice to all persons entitled to notice and thereby satisfies due
23 process.

24 7. The Court appoints Boyamian Law, Inc., Hartounian Law Firm, P.C., Bokhour
25 Law Group, P.C. and Falakassa Law, P.C. as Class Counsel. Class Counsel are authorized to act
26 on behalf of the Class with respect to all acts or consents required by, or which may be given,
27 pursuant to the Settlement, and such other acts reasonably necessary to finalize the Settlement and
28 its terms. Any Class Members may enter an appearance through his or her own counsel at such

Class Member's own expense. Any Class Member who does not enter an appearance or appear on his or her own behalf will be represented by Class Counsel.

8. Plaintiffs Jesus Andrade and Michael Hernandez are appointed as Class Representatives.

9. The rights of any potential objectors to the proposed Settlement are adequately protected in that they may exclude themselves from the Settlement or they may object to the Settlement. However, to do so they must follow the procedures outlined in the MOU, Motion, and Notice of Class Action Settlement for making objections and opt-outs.

10. The Court approves and appoints ILYM Group, Inc. as the Settlement Administrator.

11. For any checks that go uncashed after 180 days of mailing, and any Settlement Class Member that does not have a valid address, their share of the Net Settlement Amount will be forwarded by the Settlement Administrator to transmit the funds represented by such checks to the California Controller's Unclaimed Property Fund in the name of the Class Member.

12. The following dates shall govern for purposes of this Settlement:

Date Triggering Events	Event
The date of this order	Date of Preliminary Approval of the Settlement and conditional certification of the Class ("Preliminary Approval")
Within seven (7) calendar days of Preliminary Approval	Deadline to Deliver Class Information to Settlement Administrator [within 7 calendar days of Preliminary Approval]
Within fifteen (15) days after the information is provided to the Settlement Administrator	Deadline for Settlement Administrator to mail Class Notice Packets (Mailing Date) [within 15 calendar days of Preliminary Approval]

<p>1 Within forty-five (45) calendar days after</p> <p>2 Mailing Date; this deadline will be</p> <p>3 extended fourteen (14) calendar days for</p> <p>4 any Class Member who is re-mailed a</p> <p>5 Notice Packet by the Claims Administrator</p>	<p>Opt-Out and Objection deadline for Class</p> <p>Members to submit objections or requests for</p> <p>exclusion/opt-out from Settlement [within</p> <p>forty-five (45) calendar days after Mailing</p> <p>Date; this deadline will be extended fourteen</p> <p>(14) calendar days for any Class Member who</p> <p>is re-mailed a Notice Packet by the Claims</p> <p>Administrator]</p>
<p>7 No later than [DATE TBD]:</p> <p>8 <u>October 22, 2025</u></p>	<p>Plaintiffs deadline for filing: (1) Motion for</p> <p>Final Approval; (2) Application for Attorney's</p> <p>Fees, Costs, and Expenses, (3) Motion for</p> <p>Plaintiffs Enhancement Awards; and (4)</p> <p>Declaration from Settlement Administrator</p>
<p>11 <u>November 19, 2025</u> at</p> <p>12 <u>9:00</u> a.m./p.m.</p>	<p>Final Approval Hearing</p>

13. The Court reserves the right to adjourn or continue the date of the Final Approval Hearing and all dates provided for in the Settlement without further notice to the Class and retains jurisdiction to consider all further applications arising out of, or connected with, the Settlement.

IT IS SO ORDERED.

Dated: 7/10/25



Hon. Judge ~~Brian C. Smith~~
Judge of the Superior Court

BLANCA A. BAÑUELOS