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Filed DEC 10 2025

STEPHANIE BOHRER, CLERK

By *[Signature]*
DEPUTY

Attorneys for Plaintiff Asia Hamilton-Medford

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN JOAQUIN

11 ASIA HAMILTON-MEDFORD,
12 Plaintiff,

13 vs.

14 UNITED CEREBRAL PALSY ASSOCIATION,
15 INC., a corporation, UNITED CEREBRAL PALSY
16 OF SAN JOAQUIN, CALAVERAS & AMADOR
17 COUNTIES, a corporation, CHRISTINA BAKER,
18 an individual, and DOES 1-100, inclusive,
19 Defendants.

Case No.: STK-CV-UOE-2023-14252

[Signature]
[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

20 Plaintiff Asia Hamilton-Medford's unopposed Motion for Preliminary Approval of Class Action
21 and PAGA Settlement ("Motion") came on regularly for hearing on DEC. 10, 2025 at 9:00 a.m.
22 in Department 11B, before the Honorable Robert T. Waters. Jenny D. Baysinger appeared on behalf of
23 Plaintiff Asia Hamilton-Medford ("Plaintiff") and Donald P. Sullivan appeared on behalf of Defendant
24 United Cerebral Palsy of San Joaquin, Calaveras & Amador Counties ("Defendant"). The Court,
25 having fully and carefully reviewed Plaintiff's Motion, the memorandum and declaration in support

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1 thereof, and the Settlement Agreement including the proposed Class Notice, hereby makes the
2 following determinations and orders¹:

3 1. Plaintiff Asia Hamilton-Medford is preliminarily appointed as Class Representative.

4 2. Mayall Hurley P.C., by and through Jenny D. Baysinger and Robert J. Wassermann,
5 Daniel Gaines of Gaines & Gaines, APLC, and Alex P. Katofsky of the Law Offices of Alex P.
6 Katofsky, APC are hereby preliminarily approved and appointed as Class Counsel.

7 3. ILYM is appointed as the Settlement Administrator and shall administer the Settlement
8 in accordance with the terms set forth in the Settlement Agreement and perform the functions set forth
9 therein. The Court also preliminarily approves declared fees and costs of administering the Settlement
10 of up to \$7,750.

11 4. The Class of employees covered by the Parties' Settlement consists of:

12 All individuals employed by United Cerebral Palsy of San Joaquin, Calaveras &
13 Amador Counties in non-exempt positions in California from December 26, 2019,
14 through June 4, 2025 (the "Class"). SA ¶ 1.d.

15 5. Pursuant to California Civil Procedure section 382, and for purposes of settlement only,
16 the Class is preliminarily and conditionally certified. The Class is estimated to consist of 353
17 individuals who worked 16,146 workweeks.

18 6. The Court grants preliminary approval of the Settlement between Plaintiff and
19 Defendant, based upon the terms set forth in the Settlement Agreement.

20 a. As to the Class, the Settlement Agreement appears to be fair, adequate and
21 reasonable, and the Court preliminarily approves the terms of the Settlement
22 Agreement.

23 b. The Court approves, as to form and content, the Class Notice, in substantially the
24 form attached as Exhibit A to the Settlement Agreement. The Court further
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27 ¹ All terms used in this Order Granting Preliminary Approval of Class Action Settlement (the "Order") shall have the
28 same meanings given those terms in the Parties' Joint Stipulation for Class and PAGA Representative Action Settlement
and Release ("Settlement Agreement" or "Settlement"), a copy which is attached as Exhibit 1 to the Declaration of Jenny
D. Baysinger filed with the Motion.

1 approves the procedure by which Class Members may opt out of, and object to, the
2 Settlement as set forth in the Settlement Agreement and the Class Notice.

3 7. The Court directs mailing of the Class Notice in accordance with the terms of the
4 Settlement Agreement and on the schedule set forth below. The Court finds the dates selected for the
5 mailing and distribution of the Class Notice, as set forth below, meet the requirements of due process
6 and provide the best notice practicable under the circumstances and shall constitute due and sufficient
7 notice to all persons entitled thereto.

8 8. Subject to further consideration by the Court at the time of the Final Approval Hearing,
9 the proposed PAGA Penalties of \$40,000 and payment to the LWDA of \$30,000 are preliminarily
10 approved. Distribution of \$10,000 to Class Members employed during the PAGA Period ("PAGA
11 Members") based on the formula outlined in the Settlement Agreement is also approved.

12 9. Subject to further consideration by the Court at the time of the Final Approval Hearing,
13 the proposed Class Representative Service Award of \$15,000, 1.667% of the Gross Settlement
14 Amount, to Plaintiff Asia Hamilton-Medford for her service as Class Representative is preliminarily
15 approved.

16 10. Subject to further consideration by the Court at the time of the Final Approval Hearing,
17 Class Counsel's request of attorneys' fees in the amount of 35% of the Gross Settlement Amount,
18 presently expected to be \$315,000, and declared costs of up to \$20,000, are preliminarily approved.

19 11. The Court adopts the following dates and deadlines:

20 Defendant to provide Class Data to Administrator	Within 30 calendar days of preliminary approval order
21 Administrator to mail Class Notice	Within 14 calendar days of provision of the Class Data
22 Deadline for Class Members to object or opt out	Within 45 calendar days after Notice mailed.
23 Plaintiff to file Motion for Attorneys' Fees, Costs and Enhancement Payment.	Not less than 16 court days before the Final Approval hearing.
24 Deadline for Plaintiff to file Motion for Final Approval.	Not less than 16 court days before the Final Approval hearing.
25 Final Approval Hearing.	Not less than 120 days after preliminary approval

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12. A Final Approval hearing on the question of whether the proposed Settlement, attorneys' fees to Class Counsel, and the Class Representatives' Service Award should be finally approved as fair, reasonable and adequate is scheduled in for May 13, 2026^{now}, 2026 at 9:00 a.m.. It is anticipated the Court will hear two (2) motions on that date and time; a motion for final approval of the class action settlement and a separate motion for attorneys' fees, costs, and service award. The parties to the Agreement are directed to carry out their obligations under the Settlement Agreement.

Dated: December 10, 2025



HON. ROBERT T. WATERS
SUPERIOR COURT JUDGE