

09/30/24

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

PATRICK STOCKTON, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

VENTURA RANCH RESORT, LLC; a
California Limited Liability Company; SCOTT
CORY, an individual; HR-PLUS, LLC, a
California Limited Liability Corporation; and
DOES 1 to 100, inclusive,

Defendants.

Case No.: 2021-00561683-CU-OE (Class
Action)

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

Date: October 24, 2024

Time: 8:30 a.m.

Dept.: 21

Complaint Filed: March 23, 2021

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1 3. The Court designates ILYM Group, Inc. as the third-party Settlement Administrator
2 for mailing the Notice Packet and all other administrative and other services provided for under the
3 Settlement Agreement;

4 4. The Court approves, as to form and content, the Class Notice, along with the
5 accompanying Objection and Exclusion forms (collectively, the “Notice Packet”) attached as
6 **Exhibit 1** to this Order;

7 5. The Court finds that the form of notice to the Class Members regarding the pendency
8 of the Action and of this settlement, and the methods of giving notice to Class Members constitute
9 the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice
10 to all Class Members. The form and method of giving notice complies fully with the requirements
11 of California Code of Civil Procedure section 382 and 384, California Civil Code section 1781,
12 California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other
13 applicable law;

14 6. The Court further approves the procedures for Class Members to opt out of, object,
15 or to submit disputes in connection with the Settlement, as set forth in the Settlement Agreement and
16 Notice Packet;

17 7. The procedures and requirements for filing objections in connection with the Final
18 Approval Hearing are intended to ensure the efficient administration of justice and the orderly
19 presentation of any Class Member’s objection to the Settlement Agreement, in accordance with the
20 due process rights of all Class Members;

21 8. The Court directs the Settlement Administrator to administer the notice in accordance
22 with the Settlement Agreement, including the following: a) translating the Notice Packet in Spanish;
23 b) mailing the Notice Packet to Class Members in both English and Spanish; and c) including a
24 stamped envelope addressed to the Settlement Administrator with the Notice Packet. All exclusions,
25 objections, or disputes shall be submitted to the Settlement Administrator, not to Class Counsel or
26 Defendants’ counsel, however, the Settlement Administrator will submit copies to the Parties’
27 counsel.

28 9. A Final Approval Hearing on the question of whether the settlement should be finally
approved as fair, reasonable and adequate is scheduled in Department 21 of the above-entitled Court

1 located at 800 South Victoria Ave., CA 93009 on April 3, 2025 at 8:20 a.m. (approximately 120 days
2 following the preliminary approval) at _____ a.m. / p.m.;

3 10. At the Final Approval Hearing, the Court will consider: a) whether the settlement
4 should be finally approved as fair, reasonable, and adequate for the Class and the judgment granting
5 final approval of the settlement should be entered; and b) whether Plaintiff's application for
6 attorneys' fees and costs, the Representative Plaintiff's service award, and the Settlement
7 Administration Costs should be granted;

8 11. Counsel for the Parties shall file any memoranda, declarations, or other statements
9 and materials in support of final approval of the settlement, the attorneys' fees and costs and the
10 service award no later than 10 court days before the Final Approval Hearing.


11 12. The Court reserves the right to adjourn or continue the date of the Final Approval
12 Hearing and all dates provided for in the Settlement, without further notice to the Class, and retains
13 jurisdiction to consider further matters concerning the Settlement;

14 13. Pending the Final Approval Hearing, all proceedings in this action, other than
15 proceedings necessary to carry out or enforce the terms and conditions of the Settlement Agreement
16 and this Order, are stayed; and

17 14. Counsel for the Parties are hereby authorized to utilize all reasonable procedures in
18 connection with the administration of the settlement which are not materially inconsistent with either
19 this Order or the terms of the Settlement Agreement.

20 **IT IS SO ORDERED.**

21 DATED: 01/26/2025

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23 Charmaine H Buehner
24 The Hon. Jeffrey G. Bennett
25 Judge of the Superior Court
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