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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF LOS ANGELES

11 PAULINA VEGA, as an aggrieved employee
pursuant to the Private Attorneys General Act
12 (“PAGA”), on behalf of the State of California
and other aggrieved employees,

13 Plaintiff,

14 vs.

15 JPMORGAN CHASE BANK, N.A., a New
16 York corporation; and DOES 1 through 10,
inclusive,

17 Defendant.
18

Case No.: BC698750

**[AMENDED ~~PROPOSED~~] ORDER
GRANTING MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: March 2, 2020

Time: 8:30 a.m.

Place: Department 34

1 **ORDER**

2 This Court conducted a hearing on Plaintiff's Motion for Preliminary Approval of the Class
3 Action Settlement (the "Motion"). Having considered the Motion and the points and authorities
4 submitted in support of the Motion, including the Joint Stipulation of Class and PAGA Action
5 Settlement and Release ("Settlement Agreement" or "Settlement") and exhibits, and **GOOD CAUSE**
6 appearing, **IT IS HEREBY ORDERED** that the Motion is **GRANTED**, subject to the following
7 findings and orders:

8 1. This Order incorporates by reference the definitions in the Settlement Agreement, and
9 all terms defined therein shall have the same meaning as set forth in the Settlement Agreement.

10 2. The Settlement Class shall be conditionally certified for settlement purposes only and
11 shall consist of ny non-exempt Teller, In-Store Teller, Senior Teller, Lead Teller, Lead Teller Operations
12 Specialist ("LTOS"), LTOS Trainee, Associate Banker, Lead Associate Operations, Personal Banker,
13 Private Client Banker, or Relationship Banker position, or an equivalent position, in California during the
14 period from November 17, 2016 to August 1, 2019.

15 3. The class action settlement set forth in the Settlement Agreement, entered into among
16 the Parties and their counsel, is preliminarily approved as it appears to be proper, to fall within the range
17 of reasonableness, to be the product of arm's-length and informed negotiations, to treat all Class
18 Members fairly, and to be presumptively valid, subject only to any objections that may be raised at or
19 before the final approval hearing. The Court further finds that Plaintiff's Counsel conducted extensive
20 investigation and research, and that they were able to reasonably evaluate Plaintiff's position and the
21 strengths and weaknesses of her claims and the ability to certify them. Plaintiff's Counsel have provided
22 the Court with enough information about the nature and magnitude of the claims being settled, as well as
23 the impediments to recovery, to make an independent assessment of the reasonableness of the terms to
24 which the Parties have agreed.

25 4. The Court also finds that settlement now will avoid additional and potentially substantial
26 litigation costs, as well as delay and risks if the Parties were to continue to litigate the Action.

27 5. The Court preliminarily approves the Settlement Agreement, including all the terms and
28 conditions set forth therein and the Class Settlement Amount and allocation of payments.

1 6. The rights of any potential dissenters to the proposed Settlement are adequately
2 protected in that they may exclude themselves from the Settlement and proceed with any alleged claims
3 they may have against Defendant, or they may object to the Settlement and appear before this Court.
4 However, to do so they must follow the procedures outlined in the Settlement Agreement and Notice of
5 Class Action Settlement.

6 7. The Court approves, as to form and content, the proposed Notice of Class Action
7 Settlement (“Notice Packet”).

8 8. The Court directs the mailing, by First-Class U.S. mail, of the Notice Packets to Class
9 Members in accordance with the schedule set forth below and the other procedures described in the
10 Settlement Agreement. The Court finds that the method selected for communicating the preliminary
11 approval of the Settlement Agreement to Class Members is the best notice practicable under the
12 circumstances, constitutes due and sufficient notice to all persons entitled to notice, and thereby satisfies
13 due process.

14 9. Plaintiff Paulina Vega is suitable class representative and is appointed the Class
15 representative for the Settlement Class conditionally certified by this Order.

16 10. The Court appoints Capstone Law APC as Class Counsel. The Court finds that counsel
17 have demonstrable experience litigating, certifying, and settling class actions, and will serve as adequate
18 counsel for the Class conditionally certified by this Order.

19 11. The Court approves and appoints Kurtzman Carson Consultants as the Settlement
20 Administrator.

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

Date	Event
March 16, 2020 (or not later than 14 calendar days after the Court grants preliminary approval of the Settlement Agreement, if later)	Last day for Defendant to produce the class list to the Settlement Administrator.
March 30, 2020 (or not later than 14 calendar days after Defendant produces the class list, if later)	Last day for the Settlement Administrator to mail Notice Packets to all Class Members.
May 29, 2020 (or not later than 60 calendar days after the Settlement Administrator mails the Notice Packets, if later)	Last day for Class Members to opt out or object to the Settlement.

Date	Event
June 5, 2020	Last day for Plaintiff to file the Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and a Class Representative Enhancement Payment.
June 30, 2020 at 8:30 a.m.	Hearing on Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and a Class Representative Enhancement Payment.

13. The Court expressly reserves the right to continue or adjourn the final approval hearing without further notice to the Class Members.

IT IS SO ORDERED.

Dated: 03/02/2020



MICHAEL LINFIELD

Hon. Michael P. Linfield
Los Angeles Superior Court Judge