

Electronically Received 11/10/2025 05:06 PM

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN THE COUNTY OF LOS ANGELES**

11 ROSA ALVAREZ, an individual, on behalf
of himself and on behalf of all persons
12 similarly situated,

13 Plaintiff,

14 v.

15 BRITEWORKS, INC., a California
corporation; and DOES 1-100, Inclusive,

16 Defendants.
17
18
19

Case No. 22STCV35169

CLASS ACTION

*Assigned for all purposes to:
Hon. William F. Highberger, Dept. SSC-10*

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL**

**Date: March 3, 2026
Time: 10:00 a.m.
Dept.: SSC-10**

FILED
Superior Court of California
County of Los Angeles
04/08/2026

David W. Slayton, Executive Officer / Clerk of Court

By: E. Muñoz Deputy

1 The Court, having read the papers filed regarding Plaintiff’s unopposed Motion for
2 Preliminary Approval of Class Action Settlement, and having heard argument regarding the
3 Motion, hereby finds and ORDERS as follows:

4 1. The Class Action and PAGA Settlement Agreement (“Settlement Agreement”)
5 attached as Exhibit 1 to the Declaration of Chad Saunders, filed on or about November 10, 2025,
6 is within the range of possible recovery and, subject to further consideration at the Final Approval
7 Hearing described below, is preliminarily approved as fair, reasonable, and adequate;

8 2 For purposes of settlement only, the Court provisionally and conditionally certifies
9 the following class: “all current and former non-exempt hourly employees employed by
10 Defendant in California during the Class Period of November 4, 2018 to January 9, 2024.”

11 3. The Court finds the Settlement Class, consisting of at least 766 members, is so
12 numerous that joinder of all members is impracticable, and that the Settlement Class is
13 ascertainable by reference to the business records of defendant Briteworks.

14 4. The Court finds further there are questions of law and fact common to the entire
15 Settlement Class, which common questions predominate over any individualized questions of law
16 or fact. These common questions include, without limitation: (1) whether Briteworks paid
17 Settlement Class Members for all wages due, (2) whether Briteworks provided Settlement Class
18 Members with all required meal and rest periods, (3) whether Briteworks provided Settlement
19 Class Members with proper itemized wage statements, (4) whether Briteworks properly
20 reimbursed for use of personal cell phones; and (5) whether Briteworks timely paid wages due on
21 separation of employment.

22 5. The Court finds further the claims of named Plaintiff Rosa Alvarez are typical of
23 the claims of the Settlement Class, and that she will fairly and adequately protect the interests of
24 the Settlement Class. Accordingly, the Court appoints Rosa Alvarez as the Class Representative,
25 and appoints her counsel of record, Zachary M. Crosner, Brandon Brouillette, and Chad Saunders
26 and Crosner Legal, P.C., as Class Counsel.

27 6. The Court finds further that certification of the Settlement Class is superior to
28 other available means for the fair and efficient adjudication of the controversy.

1 7. The Court finds further that, in the present case, the proposed method of providing
2 notice of the Settlement to the Settlement Class via First Class U.S. Mail to each Settlement Class
3 Member's last known address, is reasonably calculated to notify the Settlement Class Members of
4 the proposed Settlement and provides the best notice possible under the circumstances. The
5 Court also finds the Notice of Class Action Settlement form, a copy of which is attached to the
6 Settlement Agreement as Exhibit A, is sufficient to inform the Settlement Class Members of the
7 terms of the Settlement and their rights thereunder, including the right to object to the Settlement
8 or any part thereof and the procedure for doing so, their right to exclude themselves from the
9 Settlement and the procedure for doing so, their right to obtain a portion of the Settlement
10 proceeds, and the date, time and location of the Final Approval Hearing. The proposed Notice of
11 Class Action Settlement and the procedure for providing Notice set forth in the Settlement
12 Agreement, are approved by the Court.

13 8. Under the terms of the Settlement Agreement, the Court approves the Parties'
14 selection of Atticus Administration, LLC as the Settlement Administrator. The Settlement
15 Administrator is ordered to mail the Class Notice to the Settlement Class Members via First-Class
16 U.S. Mail as specified in the Settlement Agreement, and to otherwise carry out all other duties set
17 forth in the Settlement Agreement. The Parties are ordered to carry out and comply with all terms
18 of this Order and the Settlement Agreement, and particularly with respect to providing the
19 Settlement Administrator all information necessary to perform its duties under the Settlement
20 Agreement.

21 9. Any member of the Settlement Class who wishes to comment on or object to the
22 Settlement or any term thereof, including any proposed award of attorney's fees and costs to
23 Class Counsel or any proposed representative enhancement to the Class Representative, shall
24 have forty-five (45) days from the mailing of the Class Notice to submit his or her comments
25 and/or objection to the Settlement Administrator, as set forth in the Settlement Agreement and
26 Class Notice.

27 10. A Final Approval Hearing is hereby set for 8/26, 2026, at 11am in Department SSC-
28 10 of the Los Angeles County Superior Court, to consider any objections to the Settlement,

1 determine if the proposed Settlement should be found fair, adequate and reasonable and given full
2 and final approval by the Court, and to determine the amount of attorney's fees and costs awarded
3 to Class Counsel, the amount of any representative enhancement award to the Class
4 Representative, and to approve the fees and costs payable to the Settlement Administrator. All
5 legal memoranda, affidavits, declarations, or other evidence in support of the request for final
6 approval, the award of attorney's fees and costs to Class Counsel, the enhancement award to the
7 Class Representative, and the fees and costs of the Settlement Administrator, shall be filed no
8 later than sixteen (16) court days prior to the Final Approval Hearing. The Court reserves the
9 right to continue the Final Approval Hearing without further notice to the Settlement Class
10 Members.

11 11. Provided he or she has not submitted a timely and valid Request for Exclusion, any
12 Class Member may appear, personally or through his or her own counsel, and be heard at the
13 Final Approval Hearing regardless of whether he or she has submitted a written objection.

14 **IT IS SO ORDERED.**

15
16 Dated: 04/08/2026



W. F. Highberger

17 Judge of the Superior Court
18 William F. Highberger / Judge