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ATTORNEYS FOR PLAINTIFFS

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

URSULA GRUENERT, on behalf of herself,  
all other similarly situated and typical  
individuals, and the general public,

Plaintiff,

vs.

TAMALPAIS HIGH SCHOOL DISTRICT;  
and DOES 1 through 50, inclusive,

Defendant(s).

**JOHNSON SCHACHTER & LEWIS**

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**FILED**

Superior Court of California  
County of Marin

**03/06/2024**

James M. Kim, Clerk of the Court

J. Dale, Deputy *J. Dale*

Case No.: CIV-2103521

~~-(PROPOSED)-~~ ORDER GRANTING  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT

TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

The Application for Preliminary Approval of a Class Action Settlement came before this Court, the Honorable Sheila S. Lichtblau presiding, on March 6, 2024. This Court, having

1 considered the papers submitted in support of the application of the parties, HEREBY ORDERS  
2 THE FOLLOWING:

3 1. This Court grants preliminary approval of the Settlement and the Settlement Class  
4 based upon the terms set forth in the Settlement Agreement and Release of Claims between  
5 Plaintiff and Defendant (“Settlement Agreement” or “Settlement”) filed herewith. The  
6 Settlement appears to be fair, adequate, and reasonable to the Class. The Joint Motion for  
7 Preliminary Approval is GRANTED.

8 2. The Settlement falls within the range of reasonableness and appears to be  
9 presumptively valid, subject only to any objections that may be raised at the final fairness hearing  
10 and final approval by this Court.

11 3. A final fairness hearing on the question of whether the proposed Settlement,  
12 attorneys’ fees to Class Counsel, and the Class Representative Enhancement Award should be  
13 finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in  
14 accordance with the Implementation Schedule set forth below.

15 4. This Court approves, as to form and content, the Notice of Pendency of Class  
16 Action, Proposed Class Action Settlement, and Hearing Date for Court Approval (“Notice of  
17 Pendency of Class Action”), in substantially the form attached to the Stipulation of Settlement as  
18 Exhibit A. This Court approves the procedure for Class Members to participate in, to opt out of,  
19 and to object to the Settlement as set forth in the Notice of Pendency of Class Action.

20 5. The Court directs the mailing of the Notice of Pendency of Class Action and  
21 Proposed Settlement by first class mail to the Class Members in accordance with the  
22 Implementation Schedule set forth below. This Court finds the dates selected for the mailing and  
23 distribution of the Notice and the Claim Form, as set forth in the Implementation Schedule, meet  
24 the requirements of due process and provide the best notice practicable under the circumstances  
25 and shall constitute due and sufficient notice to all persons entitled thereto.

26 6. It is ordered that the Settlement Class is preliminarily certified for settlement  
27 purposes only.  
28

1           7.       This Court confirms Plaintiff Ursula Gruenert as Class Representative, and Mark  
 2 Thierman, Esq., Joshua Buck, Esq., and Leah Jones, Esq., of Thierman Buck, LLP, and Ryan F.  
 3 Stephan and Catherine T. Michell of Stephan Zouras, LLP as Class Counsel.

4           8.       This Court confirms ILYM Group, Inc., as the Claims Administrator.

5           9.       This Court orders the following Implementation Schedule for further proceedings:

6	a.	Deadline for Defendant to Submit Class Member Information to Claims Administrator	<u>March 27, 2024</u> , within 21 calendar days after entry of the preliminary approval order.
7	b.	Deadline for Claims Administrator to Mail the Notice and the Claim Form to Class Members	<u>April 10, 2024</u> , within 14 calendar days after receipt of the Class Member Information.
8	c.	Deadline for Class Members to Postmark Requests to Opt-Out and Objections to Settlement	<u>May 10, 2024</u> , no later than 30 calendar days of the mailing date of the Class Notice.
9	d.	Deadline for Class Counsel to file Motion for Final Approval of Settlement, Attorneys' Fees, Costs, and Enhancement Award	<del>May 24, 2024, within 14</del> <u>6/10/2024</u> calendar days after the <del>deadline to Opt-Out of object.</del>
10	e.	Deadline for Class Counsel to File Declaration from Claims Administrator of Due Diligence and Proof of Mailing	<del>May 24, 2024, within 14</del> <u>6/10/24</u> calendar days after the <del>deadline to Opt-Out of object.</del>
11	f.	Final Fairness Hearing and Final Approval	July 17, 2024 at 1:30 pm
12	g.	Deadline for Defendant to Fund Settlement Account maintained by Claims Administrator	_____, within <del>ten (10)</del> 20 calendar days after the Effective Date of the Settlement.
13	h.	Deadline for Claims Administrator to wire transfer the Attorneys' Fees and Costs to Class Counsel (if Settlement is Effective)	_____, within ten (10) calendar days after the deadline to Fund the Settlement.
14	i.	Deadline for Claims Administrator to mail the Settlement Awards to Class Members and the Enhancement Awards to Class Representatives (if Settlement is Effective)	_____, within ten (10) calendar days after the deadline to Fund the Settlement.
15	j.	Claims Administrator to File Proof of Payment of Settlement Awards, Enhancement	_____, within one-hundred eighty (180) calendar

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Award, Attorneys' Fees and Costs (if Settlement is Effective)	days after the deadline to Fund the Settlement.
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**IT IS SO ORDERED.**

Dated: 03/06/2024



Hon. Sheila S. Lichtblau, Superior Court

Judge