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ORDER

**IN THE SUPERIOR COURT OF NEW JERSEY  
CAMDEN COUNTY, LAW DIVISION**

MIGUEL BENITO VELAZQUEZ; MONICA  
MENDEZ; and PAULA MENDEZ, on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

AUTO SUPER WASH, INC; AUTO SHINE  
EXPRESS, LLC; AUTO SHINE PLUS, INC;  
ACCU WASH, INC.; WASH RITE, INC; WZ,  
INC; XTREME WASH, INC; and AMIN  
KHALIFA,

Defendants.

DOCKET NO.: CAM-L-003758-24

CIVIL ACTION

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S UNCONTESTED  
MOTION FOR PRELIMINARY  
APPROVAL OF THE PROPOSED  
CLASS ACTION SETTLEMENT**

**THIS MATTER**, having been brought before the Court on motion by Plaintiffs Miguel Benito Velazquez, Monica Mendez, and Paula Mendez for an order granting preliminary approval of the proposed class settlement, the Court having considered the submissions, including the Proposed Settlement Agreement and Proposed Notice Form:

IT IS on this 7 day of November, 2025,

**ORDERED** that Plaintiff's Uncontested Motion for Preliminary Approval of the Proposed Class Action Settlement is **GRANTED**, as follows:

1. The Court grants preliminary, non-binding approval of the Proposed Settlement Agreement filed with the Court.
2. For settlement purposes only, and without prejudice to Defendants' right to contest certification if final approval is denied, this Court conditionally certifies a settlement class under Rule 4:32-1(b)(3), defined as follows: All current and former non-exempt employees who worked

at, or is currently working at, at least one Corporate Defendant between August 6, 2019 and June 16, 2025, with the exception of hourly employees who perform(ed) purely bookkeeping and accounting functions.

3. The Court preliminarily appoints Plaintiffs Miguel Benito Velazquez, Monica Mendez, and Paula Mendez as Class Representatives.

4. The Court preliminarily appoints Ryan Allen Hancock, Samuel H. Datlof, Jordan R. Konell, and Kate Brown as Class Counsel.

5. The Court appoints Analytics as the Settlement Administrator. Costs of administration shall be paid from the Gross Settlement Amount.

6. The Court approves the contents of the Proposed Notice Form attached to the Proposed Settlement Agreement, subject to changes agreed to by the Parties for accuracy, formatting, and clarity.

7. Within ten (10) calendar days of this Order, Defendants shall provide to the Settlement Administrator the Class List.

8. Within ten (10) business days of receiving the Class List, the Settlement Administrator shall provide Class Counsel and Defendants' Counsel with estimated minimum settlement shares for each Class Member.

9. Class Counsel and Defendants' Counsel shall review and approve (or otherwise raise any concerns with) the Settlement Administrator's calculation of the Settlement Awards within five (5) business days of their receipt.

10. Within five (5) business days of receiving approval of the minimum settlement awards and Notice, the Settlement Administrator shall send the Notice to Plaintiffs and Class Members as provided in the Settlement Agreement.

11. Any Class Member who intends to object to the Settlement Agreement must send a written objection to the Settlement Administrator postmarked on or before the forty-five (45) days after the Notice is initially mailed by the Settlement Administrator (the "Notice Deadline"). The Class Member is entitled to be heard at the Final Approval Hearing if they file written notice of their intention to appear with the Court and serve said notice upon Class Counsel and Defendants' Counsel by the Notice Deadline.

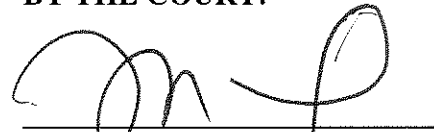
12. A Class Member may request to be excluded from settlement by sending a written request for exclusion to the Settlement Administrator postmarked on or before the forty-five (45) days after the Notice is initially mailed by the Settlement Administrator. Any Class Member who elects to be excluded shall not: (1) be bound by any orders or the Final Judgment; (2) be entitled to relief under the Settlement Agreement; (3) gain any rights by virtue of the Settlement Agreement; or (4) be entitled to object to any aspect of the Settlement Agreement. The Settlement Administrator shall promptly log each request for exclusion that it receives and provide copies of the log and all such requests for exclusion to Class Counsel and Defendants' Counsel.

13. The Court shall hold a Final Approval Hearing pursuant to Rule 4:32-2(e)(C) on Wed, Jan 28, 2026 at Camden County Hall of Justice in Courtroom 32 (in person, not Zoom) of the Camden County Hall of Justice, 1010 South 5<sup>th</sup> Street, Camden, New Jersey 08101. At the Final Approval Hearing, the Court shall consider: (i) comments and/or objections regarding the Settlement Agreement, (ii) the fairness, reasonableness, and adequacy of the Settlement Agreement, (iii) whether the Court should issue a Final Approval Order approving the Settlement Agreement, (iv) whether the Court should grant Class Counsel's requested Fee Award, (v) whether the Court should dismiss this action with prejudice, and (vi) such other matters as the Court may deem appropriate.

14. Plaintiff's Motion for Final Approval shall be due fourteen (14) calendar days before the Final Approval Hearing. Plaintiff shall include a proposed form of order granting final approval.

15. Class Members shall be preliminarily barred and enjoined from instituting and prosecuting any of the claims asserted by Plaintiff in this matter against Defendants, pending the Court's decision whether to grant final approval of the Settlement Agreement.

**BY THE COURT:**

  
**Hon. Michael J. Kassel, J.S.C.**

*Reasons set forth On the Record*

~~CONTESTED~~

X UNCONTESTED

11/7/2025