

**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)  
Jackland K. Hom (State Bar #327243)  
Julieann Alvarado (State Bar #334727)  
5440 Morehouse Drive, Suite 3600  
San Diego, CA 92121  
Telephone: (619)255-9047  
Facsimile: (858) 404-9203  
[shani@zakaylaw.com](mailto:shani@zakaylaw.com)  
[jackland@zakaylaw.com](mailto:jackland@zakaylaw.com)  
[julieann@zakaylaw.com](mailto:julieann@zakaylaw.com)

Attorney for Plaintiff VY TRINH

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN DIEGO**

VY TRINH, an individual, on behalf of  
himself and on behalf of all persons similarly  
situated,

Plaintiff,

vs.

PRECISION METAL PRODUCTS, INC. a  
Delaware Corporation; HBD INDUSTRIES,  
INC., a Delaware Corporation; and DOES 1-50,  
Inclusive,

Defendants.

Case No: 37-2021-00021898-CU-OE-CTL

**PROOF OF SERVICE**

**DECLARATION OF SERVICE**

I, Natalia Michele, declare:

I am over the age of eighteen years and not a party to the case. I am employed in the County of San Diego, State of California, where the mailing occurred; and my business address is 5440 Morehouse Drive, Suite 3600, San Diego, California 92121.

On the date specified below, I served the following documents as described below:

- **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT;**
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT;**
- **DECLARATION OF JEAN CLAUDE LAPUYADE IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT;**
- **DECLARATION OF SHANI O. ZAKAY IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**
- **DECLARATION OF VY TRINH IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF LISA MULLINS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**

☐ **BY MAIL** - I deposited such envelope in the mail at San Diego, California. The envelope was mailed with sufficient postage thereon. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with sufficient postage thereon at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing affidavit. Served to the following parties via U.S. Postal Service.

[ ] **BY PERSONAL SERVICE** - I caused such envelope to be delivered by a process server employed by .

[ ] **VIA FACSIMILE** - I faxed said document, to the office(s) of the addresses shown on the attached Service List and the transmission was reported as complete and without error.

[x] **BY ELECTRONIC TRANSMISSION** - I transmitted a PDF version of this document by way of email to the email addresses identified on the attached service list.

[ ] **BY OVERNIGHT DELIVERY** - I deposited such envelope for collection and delivery by FedEx with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by FedEx. They are deposited with a facility regularly maintained by FedEx for receipt on the same day in the ordinary course of business.

[x] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

[ ] **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 16, 2023, at San Diego, California.

By: Natalia Michele  
Natalia Michele

## **SERVICE LIST**

*Vy Trinh v. Precision Metal Products, Inc., et al.*  
San Diego Civil Court Case No. 37-2022-00000965-CU-OE-CTL

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Jean-Claude Lapuyade, Esq.<br/>JCL Law Firm, APC<br/>5440 Morehouse Drive, Suite 3600<br/>San Diego, CA 92121<br/>T: 619-599-8292<br/>F: 619-599-8291<br/><a href="mailto:jlapuyade@jcl-lawfirm.com">jlapuyade@jcl-lawfirm.com</a></p> <p>Handling Paralegals:<br/>Tesla Stone<br/><a href="mailto:tstone@jcl-lawfirm.com">tstone@jcl-lawfirm.com</a><br/>Maria Watters<br/><a href="mailto:mwatters@jcl-lawfirm.com">mwatters@jcl-lawfirm.com</a></p> <p><b>Co-Counsel for PLAINTIFF</b></p>                                                                                                                                                                                                                                                                         | <p>Shani O. Zakay, Esq.<br/>Jackland Hom, Esq.<br/>Julieann Alvarado, Esq.<br/>Zakay Law Group<br/>5440 Morehouse Drive, Suite 3600<br/>San Diego, CA 92121<br/>T: 619-892-7095<br/>F: 858-404-9203<br/><a href="mailto:shani@zakaylaw.com">shani@zakaylaw.com</a><br/><a href="mailto:jackland@zakaylaw.com">jackland@zakaylaw.com</a><br/><a href="mailto:julieann@zakaylaw.com">julieann@zakaylaw.com</a></p> <p>Handling Paralegal:<br/>Natalia Michele<br/><a href="mailto:natalia@zakaylaw.com">natalia@zakaylaw.com</a></p> <p><b>Co-Counsel for PLAINTIFF</b></p> |
| <p>Mark S. Posard, Esq.<br/>Tatiana Dupuy, Esq.<br/>Annette L. Rose, Esq.<br/>Linh T. Hua, Esq.<br/>Gordon Rees Scully Mansukhani, LLP<br/>101 W. Broadway, Suite 2000<br/>San Diego, CA 92101<br/>Telephone: (619) 696-6700<br/>Facsimile: (619) 696-7124<br/><a href="mailto:mposard@grsm.com">mposard@grsm.com</a><br/><a href="mailto:tdupuy@grsm.com">tdupuy@grsm.com</a><br/><a href="mailto:arose@grsm.com">arose@grsm.com</a><br/><a href="mailto:lhua@grsm.com">lhua@grsm.com</a></p> <p>Other Service:<br/><a href="mailto:vwhitaker@grsm.com">vwhitaker@grsm.com</a><br/><a href="mailto:dbrodit-terry@gordonrees.com">dbrodit-terry@gordonrees.com</a><br/><a href="mailto:sdaubert@grsm.com">sdaubert@grsm.com</a></p> <p><b>Counsel for Defendants</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |