

# Subject: Mediation Day of July 29, 2021-- Mediator's Proposal has been acc



**Smith-Joo, Cathy** <cathysmithjoo@paulhastings.com>  
to Roger Haag, Brent Buchsbaum, Brier Setlur, Jamie Stein

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Counsel:

Mediator Paul Grossman has asked me to advise you that both sides have accepted the Mediator's Proposal July 29, 2021 of *Jorge Avalos v. Unvarnished, Inc.*; *600 Spring LLC*; *Scott Gillen*.

The Mediator thanks you for allowing him to mediate with you.

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**PAUL**  
**HASTINGS**

**Cathy Smith-Joo** | Secretary to Mediator Paul Grossman  
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MEDIATOR'S PROPOSAL

Mediation of: *Jorge Avalos v. Unvarnished, Inc.; 600 Spring, LLC; Scott Gillen*

Mediation Date: Thursday, July 29, 2021

- Overall settlement amount – \$200,000 all in (amounts set forth below to come out of the all-in figure).
- 35% attorneys' fees
- Recoverable costs
- \$10,000 to PAGA: (75% to LWDA, 25% distributable to Class)
- Individual enhancement payment of \$10,000 to be paid to named Plaintiff Jorge Avalos, who will execute a full individual release.
- Release of all claims made or which could have been made based on the facts pled in the Complaint through preliminary approval.
- Defendants' right to cancel if over 5% opt out
- Claims Administrator to be agreed to by the parties
- Confidentiality through preliminary approval; no publicity
- Any post-agreement disputes to be referred to Mediator Paul Grossman for resolution



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PAUL GROSSMAN  
MEDIATOR

ACCEPTED:

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Counsel for Plaintiff

ACCEPTED:

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Counsel for Defendants