

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
LIZETTE RODRIGUEZ (SBN 326572)
JUSTICE LAW CORPORATION
751 N. Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259

Attorneys for Plaintiff

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by Superior Court of CA,
County of Santa Clara,
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Case #20CV368343
Envelope: 9425492**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

ROBIN QUIUSKY, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

INTEVAC, INC., a Delaware corporation;
INTEVAC PHOTONICS, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 20CV368343

Assigned for All Purposes to:
Honorable Sunil Kulkarni
Department 1

CLASS ACTION

**SUPPLEMENTAL BRIEF IN SUPPORT
OF PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

*[Supplemental Declaration of Proposed Class
Counsel (Douglas Han) filed concurrently
herewith]*

Motion for Preliminary Approval Hearing:

Hearing Date: June 30, 2022
Hearing Time: 1:30 p.m.
Hearing Place: Department 1

Complaint Filed: July 14, 2020
FAC Filed: July 2, 2021
Trial Date: None Set

Plaintiff Robin Quiusky (“Plaintiff”) provide this supplemental submission in response to the Court’s tentative ruling.

The chart below lists each of the Court’s issues from the tentative ruling and the revisions/submissions made to address each concern.

Ruling	Revisions/Submissions
(1) The parties shall meet and confer about whether they can amend the release to conform with <i>Amaro v. Anaheim Arena Management, LLC</i> (2021) 69 Cal.App.5 th 521.	The Parties met and conferred prior to the hearing and agreed to amend the release as follows: “Upon entry of final judgment and funding of the Gross Settlement Amount, the Defendants shall be entitled to a release from the Class Members of all claims, injuries, demands, losses, damages, liquidated damages, statutory damages, costs, expenses, restitution, compensation, equitable relief, wages, interest, penalties, suits, causes of action, attorneys’ fees, obligations, rights, and liabilities of any nature, type, or description, whether known or unknown, contingent or vested, in law or in equity, or for violation of any, statute, rule, or regulation, based on direct or vicarious liability, that relate to, are based on, concern, or arise out of any of the allegations that were asserted or could have been asserted based on the facts set forth or referred to in the Complaint and on a class-wide or representative basis against the Released

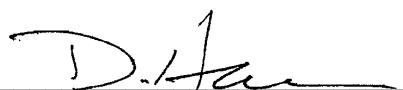
Parties. The Released Claims include all causes of action that were delineated in the Complaint as well as all causes of action arising out of or that could have been pled based on the facts set forth or referred to in the Complaint, but which were not specifically delineated as a cause of action in the Complaint. The Released Claims include violation of Labor Code sections 201-204, 210, 221, 218.5, 226, 226.3, 226.7, 510, 512, 558, 1174, 1194, 1197, 1197.1, 1198, 2800, and 2802. The Released Claims also include violation of the Private Attorneys General Act of 2004, codified at Labor Code sections 2698, et seq.; Code of Regulations Title 8 section 11040; Business & Professions Code section 17200, et seq.; California Code of Civil Procedure section 1021.5; and any other applicable provision of the Labor Code or any applicable Industrial Welfare Commission Wage Orders, in all of their iterations to the fullest extent permitted by law. The period of the release shall coincide with and extend to the limits of the Class Period. As to individual Class Members, the release applies only to the Class Period.”

(Supplemental Declaration of Douglas Han In

1		Support of Plaintiffs' Motion For Preliminary
2		Approval of Class Action Settlement ("Supp.
3		Han Decl."), ¶ 4, Exhibit 1)
4	(2) The notice must be modified so that the	The Class Notice has been amended as
5	class members' estimated payments and	required.
6	workweek information is displayed in bold	
7	within a box set off from the rest of the text on	(Supp. Han Decl., ¶ 5, Exhibit 2)
8	the first page of the notice.	
9	(3) The notice shall make it clear that class	The Class Notice has been amended as
10	members may appear at the final fairness	required.
11	hearing to make an oral objection without	
12	filing a written objection. And the Court will	(Supp. Han Decl., ¶ 5, Exhibit 2)
13	hear any objections to the PAGA portion of	
14	the settlement.	
15	(4) The class notice shall be further modified	The Class Notice has been amended as
16	to instruct class members regarding	required.
17	appearances at the final fairness hearing.	
18		(Supp. Han Decl., ¶ 5, Exhibit 2)
19	(5) The Court assumes that the reference to the	The Parties agree and the Class Notice has
20	"California State Controller Unpaid Wages	been amended to reflect this.
21	Fund" is a reference to the Unclaimed	
22	Property Division of the State Controller's	(Supp. Han Decl., ¶ 5, Exhibit 2)
23	Office in the class notice	

Dated: July 11, 2022

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorneys for Plaintiff

**PROOF OF SERVICE
1013A(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Avenue, Suite 101, Pasadena, CA 91103 and my electronic service address is manderson@justicelawcorp.com

On July 12, 2022, I served the foregoing document described as

SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

for the following case: **Quiusky v. Intevac, Inc., et al.**
LWDA/Court Case No.: **LWDA Case No.: CM-783987-20**
Court Case No.: 20CV368343
Santa Clara County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 12, 2022, at Pasadena, California.



Mariah Anderson