

LARRY W. LEE, Bar No. 228175
lwlee@diversitylaw.com
KWANPORN "MAI" TULYATHAN, Bar No. 316704
ktulyathan@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

WILLIAM L. MARDER, Bar No. 170131
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff James Sims,
the Class, and Aggrieved Employees

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JAMES SIMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QG PRINTING II LLC, a Connecticut
limited liability company; 74 QG
PRINTING II LLC, business
organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 5:20-cv-01632-DMG-KK

**SUPPLEMENTAL DECLARATION OF
LLUVIA ISLAS REGARDING NOTICE
AND SETTLEMENT
ADMINISTRATION**

Date: April 19, 2024
Time: 10:00 A.M.
Courtroom: 8C
Judge: Hon. Dolly M. Gee

1 **SUPPLEMENTAL DECLARATION OF LLUVIA ISLAS**

2 I, Lluvia Islas, declare as follows:

3 1. I am a Case Manager at Phoenix Settlement Administrators (“Phoenix”), the
4 Court-appointed Class Action Settlement Administrator for *James Sims, v. QG Printing*
5 *II LLC, et al.* (the “Action”). I have personal knowledge of the facts stated herein and, if
6 called upon to testify, I could and would testify competently to such facts.

7 2. I previously executed a declaration regarding the notice and settlement
8 administration of this settlement which was submitted to the Court on March 4, 2024.

9 3. On January 12, 2024, Phoenix received a data file from Defense Counsel that
10 contained names, last known mailing addresses, Social Security numbers, and number of
11 pay periods worked by each Class Member (“Class List”) during the applicable Class
12 Period and PAGA Period. The Class List contained one thousand eight (1,008)
13 individuals, seven hundred eighty (780) of whom are Class Members and two hundred
14 twenty-eight (228) individuals who are only part of the PAGA settlement and are not Class
15 Members belonging to Group 1 and/or Group 2. On January 24, 2023, Phoenix mailed the
16 Notice via U.S. first class mail, in English and Spanish, to all seven hundred eighty (780)
17 Class Members on the Class List.

18 4. Pursuant to the Court’s Order and Counsel’s instructions, on March 4, 2024,
19 Phoenix posted the Motion for Approval of Attorneys’ Fees, Costs, and Class
20 Representative Enhancement Payment and supporting documents to Phoenix’s website,
21 available at <https://sims-v-qg-printing.phoenixcases.com/>.

22 5. The Response Deadline has passed as of March 29, 2024.

23 6. As of the date of this declaration, Phoenix has received zero (0) Request for
24 Exclusion from Class Members.

25 7. As of the date of this declaration, Phoenix has received zero (0) objections
26 from Class Members.
27
28

8. As of the date of this declaration, Phoenix has received zero (0) disputes regarding the number of pay periods worked from Class Members.

9. There are seven hundred eighty (780) Class Members who did not submit Requests for Exclusion and are therefore deemed Settlement Class Members, representing 100% of the Class. Thus, the estimated calculations remain the same as represented in my declaration submitted to the Court on March 4, 2024.

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

Executed this 5th day of April 2024, at Orange, California.

Lluvia Islas

LLUVIA ISLAS