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Attorneys for Plaintiff Julio Ochoa, individually and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

JULIO OCHOA, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

SPEECH AND LANGUAGE
DEVELOPMENT CENTER, INC.; and DOES
1 through 25, inclusive

Defendants.

Case No. 30-2020-01143577-CU-OE-CXC
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Lon F. Hurwitz
Department CX103

CLASS ACTION

SUPPLEMENTAL DECLARATION OF
LISA PAVLIK RE NOTICE AND
SETTLEMENT ADMINISTRATION

Hearing Set by Court Order - ROA #223

Date: August 30, 2024

Time: 1:30 p.m.

Dept: CX 103

Judge: Hon. Lon F. Hurwitz

Complaint filed: June 18, 2020

Trial date: Not set

1
2 **DECLARATION OF LISA PAVLIK**

3 I, Lisa Pavlik, hereby declare:

4 1. I am employed as a Project Manager by Simpluris, Inc. ("Simpluris"), the claims
5 administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Dr.,
6 Costa Mesa, CA 92626. My telephone number is (714) 415-2872. I am over twenty-one years of age
7 and authorized to make this declaration on behalf of Simpluris and myself.

8 2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa,
9 California and was approved by the Court to Administer this Settlement.

10 **CLASS MEMBER AWARDS**

11 3. Pursuant to paragraph 39 of the Amended Settlement Agreement and Release of Class
12 and Representative Action (ROA #137), the Gross Settlement Agreement would increase by
13 proportionate percentage for all additional Workweeks exceeding 10% of 18,516 Workweeks.

14 4. There are two hundred seventy-one (271) Class Members with 18,812 Workweeks,
15 which is a 1.60% increase, which did not trigger the escalator clause.

16 5. The one hundred and fifty-eight (158) Aggrieved Employees, with 2,013 PAGA Pay
17 Periods, who will be paid their portion of the PAGA Member Payment of \$6,500.00.

18 6. The ***average estimated PAGA payment*** is \$39.56, the ***highest estimated PAGA payment***
19 is \$49.68, and the ***lowest estimated PAGA payment*** is \$3.10.

20
21 I declare under penalty of perjury under the laws of the State of California that the foregoing is
22 true and correct, and that this declaration was executed on this 18th day of July 2024, in Otsego,
23 Minnesota.

24
25 
26 Lisa Pavlik