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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

VERONICA JAUREGUI SILVA, individually,
and on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

BEN MYERSON CANDY CO., INC. d/b/a
WINE WAREHOUSE, a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 20STCV21665

Assigned for All Purposes to:
Honorable Lawrence P. Riff
Department 7

CLASS ACTION

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

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); and Amended
[Proposed] Order filed concurrently
herewith]

Hearing Date: July 18, 2024
Hearing Time: 10:00 a.m.
Hearing Place: Department 7

Complaint Filed: June 4, 2020
FAC Filed: January 25, 2021
SAC Filed: November 12, 2021
Trial Date: None Set

Plaintiffs Veronica Jauregui Silva and Matthew Young (“Plaintiffs”) provide this supplemental submission in response to the Court’s ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on May 14, 2024. Prior to the Preliminary Approval Hearing, the Court issued a checklist identifying several issues the Court wanted addressed in the settlement documents. The checklist also continued the Preliminary Approval Hearing to July 18, 2024 at 10:00 a.m. to give the Parties time to address the issues set forth in the checklist.

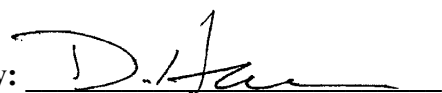
The chart below lists each of the Court’s issues and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) Scope of the Release.	The Settlement Agreement has been amended accordingly. (Supplemental Declaration of Douglas Han in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 3; Exhibit 2, § E(2).) The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 4; Exhibit 4, § 3(10)(a).)
(2) Releases Effective Date.	The Settlement Agreement has been amended accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 5; Exhibit 2, <i>supra</i>, E.)

	The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 6; Exhibit 4, §§ 3(10), 3(11).)
(3) Funding the Gross Settlement Amount and Employer-Side Payroll Taxes.	The Settlement Agreement has been amended accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 7; Exhibit 2, <i>supra</i>, at § D(2).) The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 8; Exhibit 4, § 3(1)(a).)
(4) Funding the Gross Settlement Amount.	The Settlement Agreement has been amended accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 9; Exhibit 2, <i>supra</i>, at §§ D(3), E.)

Dated: June 20, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiffs

**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 Ave., Ste. 101 Pasadena, California 91103. My electronic service address is award@justicelawcorp.com

On June 20, 2024, I served the foregoing document described as

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

for the following case: **Silva v. Ben Myerson Candy Co., Inc. d/b/a Wine Warehouse**
LWDA/Court Case No.: **LWDA-CM-807643-20**
Court Case No.: 20STCV21665
Los Angeles 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 June 20, 2024, at Pasadena, California.



Alex Ward