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Attorney for Plaintiff, HEATHER GREEN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, CIVIL COMPLEX CENTER

HEATHER GREEN, in her representative
capacity, on behalf of all aggrieved employees,

Plaintiff,

vs.

NEUINTEL, LLC, A California Limited
Liability Company, dba PRICESPIDER; and
DOES 1 through 50, inclusive,

Defendants.

Case No. **30-2020-01172202-CU-OE-CXC**

*Assigned for all purposes to The Honorable Randall J.
Sherman in Dept. CX-105*

NOTICE OF ERRATA

Hearing Date: July 1, 2022
Hearing Time: 10:00am
Hearing Department: CX-105

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff mistakenly omitted the revised PAGA Notice per court specifications from the Amended Declaration of Kimberly Lind in Support of Plaintiff's Motion for Approval of PAGA Settlement.

A true, correct and complete copy of Exhibit A to **Exhibit 2** is attached hereto.

Dated: June 21, 2022

— KO LEGAL, INC.



Kimberly Lind, Attorney for Plaintiff, Heather Green

EXHIBIT A

SETTLEMENT AGREEMENT AND GENERAL RELEASE

EXHIBIT A – TEMPLATE FOR LETTER TO AGGRIEVED EMPLOYEES

NOTICE OF SETTLEMENT OF CLAIM UNDER THE CALIFORNIA LABOR CODE PRIVATE ATTORNEYS GENERAL ACT.

On November 25, 2020, a lawsuit was filed in the Superior Court of the State of California, for the County of Orange, against Neuintel, LLC dba PriceSpider, entitled Heather Green v. Neuintel, LLC, a California Limited Liability Company, dba PriceSpider, which the Court assigned Case No. 30-2020-01172202-CU-OE-CXC. In the lawsuit, the plaintiff (Heather Green) filed several causes of action on behalf of the State of California and other “Aggrieved Employees” as defined below, and which sought civil penalties under the California Labor Code Private Attorneys General Act of 2004 (the “PAGA”).

The Court has not issued any decisions as to whether the claims have any merit, and Neuintel, LLC dba PriceSpider denies any liability or wrongdoing at all. However, a settlement agreement was reached and, per the terms of the agreement, you are entitled to receive the enclosed payment of civil penalties as part of the settlement.

The term “Aggrieved Employees” refers to all California-based exempt employees working for Neuintel, LLC dba PriceSpider in the positions of HR Coordinator, Jr. HR Generalist, Staff Accountant, and Customer Support Specialist during the “PAGA Period”. The “PAGA Period” refers to the period commencing on September 9, 2019 and ending on *[insert date of approval of the settlement of the PAGA Claim]*.

On *[insert date of approval of the settlement of the PAGA Claim]*, the Court approved a settlement of the PAGA claims pled in the lawsuit. The settlement releases and discharges all PAGA claims for civil penalties alleged in the lawsuit. Specifically, the settlement releases all claims for civil penalties under the PAGA for the following:

- (1) Violations of California Labor Code §201
- (2) Violations of California Labor Code §203
- (3) Violations of California Labor Code §204
- (4) Violations of California Labor Code §§510 and 1198
- (5) Violations of California Labor Code §512
- (6) Violations of California Labor Code §1194
- (7) Violations of California Labor Code §226(a)
- (8) Violations of California Labor Code §226.7
- (9) Violations of California Labor Code §1174(d)
- (10) Violations of California Labor Code §2802

The claims released by this settlement do not include any claim by any individual that does not arise under the PAGA or any PAGA claim for civil penalties for any alleged Labor Code violation not listed in this letter. Specifically, no claims for any unpaid or underpaid wages have settled. This settlement is without prejudice to any pursuit of such claims.

Please note that the payment under this settlement may be subject to federal, state or local tax withholdings and will be reported by Neuintel, LLC dba PriceSpider to the Internal Revenue Service

SETTLEMENT AGREEMENT AND GENERAL RELEASE

and state tax authorities on IRS Form 1099. You should rely on your own tax advisors as to the tax consequences of your individual payment. Nothing within this notice or any other communication shall constitute or be construed or relied upon as tax advice within the meaning of United States Treasury Department Circular 230 (31 CFR Part 10, as amended). The IRS Form 1099 will be sent to you by no later than January 31, 2023.

You do not need to take any action. The enclosed payment concludes your involvement in the settlement.

Very truly yours,

Neuintel, LLC dba PriceSpider

By: _____
Its: _____

Encl.

PROOF OF SERVICE

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 100 W. Broadway, Suite 250, Long Beach, CA 90802.

On **June 21, 2022**, I served the foregoing document described herein as **NOTICE OF ERRATA**, on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Nancy Rader Whitehead SCOTT & WHITEHEAD 4675 MacArthur Court, Ste. 1240 Newport Beach, CA 92660 nwhitehead@employerlaw.com amorales@employerlaw.com Attorney for Defendant Neuintel, LLC	Labor and Workforce Development Agency <i>By Electronic Submission</i>
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☐ BY MAIL. At 100 W. Broadway, Suite 250, Long Beach, CA 90802, the envelope(s) was sealed and placed for deposit with the United States Postal Service, for collection and mailing on that date, following the firm's ordinary business practices. I am aware that on Motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

☐ BY FAX. In addition to service by mail as set forth above, a copy of said document(s) were also delivered by facsimile transmission to the addressee pursuant to Code of Civil Procedure §1013(e).

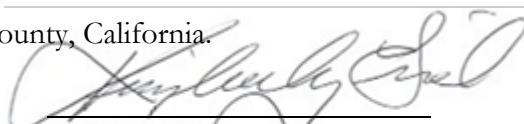
☐ BY PERSONAL SERVICE. I caused said document(s) to be hand-delivered at the Orange County Superior Court, Central Justice Center, Departments C32 to the addressee pursuant to Code of Civil Procedure §1011.

☐ BY EXPRESS MAIL. I caused said document(s) to be deposited in a box or other facility regularly maintained by the express service carrier providing overnight delivery pursuant to Code of Civil Procedure §1013(c).

☒ BY ELECTRONIC MAIL. I caused said document(s) to be delivered by electronic service pursuant to an agreement between the parties and Code of Civil Procedure §1010.6(a)(2).

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

Executed **June 21, 2022**, in Los Angeles County, California.


KIMBERLY LIND