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Attorneys for Plaintiff
FLORA FIROOZEH

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

FLORA FIROOZEH,	)	Case No.: 21STCV01402
	)	Assigned to: <i>The Hon. Wendy Chang</i>
Plaintiff,	)	Dept.: 36
vs.	)	
	)	NOTICE OF ERRATA REGARDING
	)	MOTION FOR APPROVAL OF PAGA
Q SQUARED SOLUTIONS, LLC, et	)	SETTLEMENT
al.,	)	
	)	
Defendants.	)	Action Filed: January 13, 2021
	)	Hearing Date: March 14, 2023
	)	
	)	

TO THE HONORABLE COURT, AND ALL PARTIES BY THEIR COUNSEL OF
RECORD:

Plaintiff Flora Firoozeh hereby gives notice of the attached amended settlement agreement in this matter, in relation to the upcoming March 14, 2023 hearing on Plaintiff's unopposed motion for approval of PAGA settlement. The original settlement agreement contained an error as to the covered period which was off by one year, contrary to the intentions of the parties and by mutual mistake. Defendants' counsel notified Plaintiff's counsel of the error on February 16, 2023 and all parties have signed the amended agreement with the appropriate correction.

1 A new copy of the proposed order has been submitted, to which the amended
2 settlement agreement is attached, correcting all references of October 13, 2020 to
3 October 13, 2019.

4
5 RESPECTFULLY SUBMITTED,

6
7 Dated: March 8, 2023

SOLMER LAW CORPORATION

8
9 By:



10 Thomas Solmer
11 Attorneys for Plaintiff
12 FLORA FIROOZEH
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2 **PROOF OF SERVICE**

3 I am a resident of the County of Orange. At the time of service, I was at least 18
4 years of age and not a party to this legal action. My business address is 7755 Center
5 Avenue, Suite 1100, Huntington Beach, CA 92647. On March 8, 2023, I served copies
6 of the following document(s):

7 **NOTICE OF ERRATA REGARDING MOTION FOR APPROVAL OF PAGA
8 SETTLEMENT**

9 **[PROPOSED] ORDER WITH EXHIBITS 1-4**

10 I served the document on the following persons at the addresses listed:

11 Susan W. Pangborn
12 Kendra C. Chapman
13 KILPATRICK TOWNSEND & STOCKTON LLI
14 Two Embarcadero Center, Suite 1900
15 San Francisco, CA 94111

16 spangborn@kilpatricktownsend.com
17 kchapman@kilpatricktownsend.com

18 ☒ **By e-mail or electronic transmission. I caused the documents to be
19 sent via electronic mail on the date shown above to the e-mail
20 address(es) listed above.**

21 I declare under penalty of perjury that the foregoing is true and correct. Executed
22 on March 8, 2023, in Huntington Beach, CA.

23
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27
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By: _____



Thomas Solmer