

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
TALIA LUX (SBN 336074)
HAIG HOGDANIAN (SBN 334699)
JUSTICE LAW CORPORATION
751 N. Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

ANNA M. ANDRADE-SALINAS,
individually, and on behalf of other members of
the general public similarly situated;

Plaintiff,

v.

CLAREMONT RETIREMENT
MANAGEMENT SERVICES, INC., a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 34-2021-00294807-CU-OE-GDS

Assigned for All Purposes to:
Honorable Lauri A. Damrell
Department 28

CLASS ACTION

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

[Reservation ID 294807-001]

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

Complaint Filed: February 18, 2021
FAC Filed: May 22, 2023
Trial Date: None Set

Plaintiffs Anna M. Andrade-Salinas and Wisdom Kunitz (“Plaintiffs”) provide this supplemental submission in response to the Court’s tentative ruling on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement scheduled for hearing on August 18, 2023. On August 17, 2023, prior to the scheduled Preliminary Approval Hearing, the Court issued a tentative ruling ordering Plaintiffs and Defendants Golden Pond, L.P. and Claremont Retirement Management Services, Inc. (“Defendants”) to make changes to the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) and Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”).

///

///

///

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

Ruling	Revisions/Submissions
(1) At the Preliminary Approval Hearing, the Court instructed the Parties to select a different recipient for the uncashed settlement funds.	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.”), ¶ 5; Exhibit 3, § 1.)
(2) The tentative ruling instructed the Parties to remove and revise certain sentences that were deemed unnecessary.	The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i> , at ¶ 6; Exhibit 4, § 2.)
(3) At the Preliminary Approval Hearing, the Court instructed the Parties to select a different recipient for the uncashed settlement funds.	The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i> , at ¶ 7; Exhibit 4, <i>supra</i> , at §§ 3.6., 12.)

Dated: August 22, 2023

JUSTICE LAW CORPORATION

By: _____
Douglas Han
Attorney for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 Avenue, Suite 101, Pasadena, CA 91103 and my electronic service address is jtorrez@justicelawcorp.com

On August 22, 2023, I served the foregoing document described as

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

for the following case: **Andrade-Salinas v. Claremont Retirement, et al.**
LWDA/Court Case No.: **LWDA Case No.: CM-815143-20**
Court Case No.: 34-2021-00294807
Sacramento 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

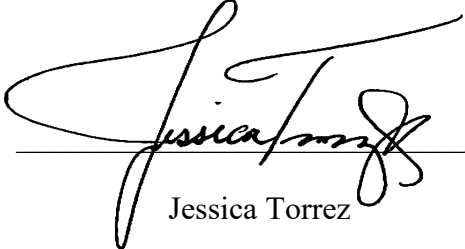
[X] BY ELECTRONIC SUBMISSION

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 August 22, 2023, at Pasadena, California.



Jessica Torrez