

Exhibit 1: Amendment to Final Approval Order and Judgment


(SIGNATURE)

PLAINTIFF/PETITIONER: Jamie Bressman and the Class
 DEFENDANT/RESPONDENT: Ross Aviation Operations, LLC.

CASE NUMBER:
 [21STCV30675 / Department SSC-1]

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):

PLEASE SEE ATTACHED PROOF OF SERVICE

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

- a. ☐ deposited the sealed envelope with the United States Postal Service.
 b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on (*date*):
 b. from (*city and state*):

4. The envelope was addressed and mailed as follows:

- a. Name of person served:

Street address:

City:

State and zip code:

- b. Name of person served:

Street address:

City:

State and zip code:

- c. Name of person served:

Street address:

City:

State and zip code:

- d. Name of person served:

Street address:

City:

State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached:

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

Date: December 11, 2025

Geoffrey Varas

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

EXHIBIT 1

Electronically Received 11/26/2025 02:38 PM

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Vartan Madoyan (SBN 270915)
Helene Mayer (SBN 332975)
Stephanie Roseman (SBN 364057)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff and the Class

FILED
Superior Court of California
County of Los Angeles
12/03/2025

David W. Slayton, Executive Officer / Clerk of Court

By: A. He Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JAMIE BRESSMAN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

v.

ROSS AVIATION OPERATIONS, LLC, a
Delaware limited liability company; and DOES
1 through 100, inclusive.

Defendants.

Case No.: 21STCV30675

Honorable Theresa M. Traber
Department SSC-1

**~~PROPOSED~~ AMENDMENT TO FINAL
APPROVAL ORDER AND JUDGMENT**

NACR Hearing Date: December 5, 2025
NACR Hearing Time: 4:00 p.m.

Complaint Filed: August 19, 2021
Judgment Entered: November 21, 2024

1 On August 19, 2021, Plaintiff Jamie Bressman (“Plaintiff”) filed a Class Action Complaint
2 for Damages, thereby commencing his class action against Defendant Ross Aviation Operations
3 LLC., (“Defendant”), entitled *Bressman v. Ross Aviation Operations, LLC.*, in the Superior Court
4 of California, County of Los Angeles, Case No 21STCV30675. Plaintiff’s Complaint alleged that
5 Defendant violated the following provisions of the California Labor Code: (1) California Labor
6 Code section 510 and 1198 (failure to pay overtime); (2) California Labor Code sections 226.7 and
7 512(a) (failure to provide compliant meal periods and associated premiums); (3) California Labor
8 Code section 226.7 (failure to provide rest periods and associated premiums); (4) California Labor
9 Code section 1194, 1997, and 1197.1 (failure to pay minimum wages); (5) California Labor Code
10 section 201 and 202 (failure to timely pay final wages); (6) California Labor Code section 204
11 (failure to timely pay wages during employment); (7) California Labor Code section 226(a) (failure
12 to provide accurate wage statements); (8) California Labor Code sections 1174(d) (failure to keep
13 complete or accurate payroll records); (9) California Labor Code sections 2800 and 2802 (failure to
14 reimburse necessary business expenses); and (10) violations of California Business and Professions
15 Code §§ 17200, *et seq.* Thereafter, on August 22, 2022, Plaintiff filed his First Amended Class
16 Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California
17 Labor Code § 2698, *Et Seq.*, which added violations of the California Labor Code §2698, *et seq.*
18 (California Labor Code Private Attorneys General Act of 2004).

19 On November 21, 2024, the Court entered the Final Approval Order and Judgment (“Final
20 Approval Order”), thereby granting final approval of the settlement of the Action reached by
21 Plaintiff and Defendant, in accordance with the Stipulation of Class Action and PAGA Settlement
22 (collectively, “Settlement,” “Agreement,” or “Settlement Agreement”), which, together with the
23 exhibits annexed thereto, set forth the terms and conditions for settlement of the Action.

24 The Declaration of Lisa Pavlik Regarding Disbursement (“Compliance Declaration”) was
25 submitted for filing in the Action on September 30, 2025.

26 On January 3, 2025, Defendant funded the qualified settlement fund (“QSF”) account that
27 the Settlement Administrator (Simpluris) established for this matter with \$762,843.45 (“Total
28 Settlement Amount”), of which \$750,000.00 was the Total Settlement Amount contemplated by the

1 Settlement Agreement, and \$12,843.56 was attributed to the employer's share of payroll taxes.
2 (Compliance Declaration, ¶ 3.)

3 On January 10, 2025, Simpluris mailed Settlement Payment checks to one hundred and fifty-
4 eight (158) Settlement Class Members, all of which were also PAGA Employees, as follows:
5 \$376,643.29 to Settlement Class Members; \$24,999.94 to PAGA Employees; \$258,856.67 for
6 Attorney's Fees and Costs to Class Counsel; \$7,500.00 Enhancement Payment to Plaintiff; and
7 \$7,000.00 for Settlement Administration Costs to Simpluris. (*Id.*, ¶ 3.)

8 Pursuant to the Settlement Agreement, Individual Settlement Payment Checks and PAGA
9 Payment Checks shall remain valid and negotiable for one hundred and eighty (180) calendar days
10 from the date of their issuance, and if not cashed, deposited, or otherwise negotiated within the 180-
11 day deadline, shall be cancelled. The funds associated with those cancelled checks that remain in
12 the account shall be transmitted, in compliance with the California Code of Civil Procedure Section
13 384, to the *cy pres* recipient, Legal Aid at Work. (Settlement Agreement, ¶ 18.)

14 The check-cashing deadline for the Settlement Class Members and Aggrieved Employees
15 expired on July 9, 2025 (i.e., one hundred and eighty (180) calendar days from the issuance date of
16 January 10, 2025). (Compliance Declaration, ¶ 6.)

17 As of September 30, 2025 there were seventeen (17) Individual Settlement Payment and
18 Individual PAGA Payment Checks that were not cashed, deposited, or otherwise negotiated. The
19 funds associated with those checks totaled \$25,181.45. (*Id.*, ¶ 5.)

20 Pursuant to the Settlement Agreement and the Final Approval Order, Simpluris shall send
21 the value of the remaining checks associated with the settlement checks that were not cashed,
22 deposited or otherwise negotiated, in the amount of \$25,181.45, to Legal Aid at Work upon Court
23 approval. (*Id.*, ¶ 7.)

24 Having reviewed the Compliance Declaration, and good cause appearing,

25 **THE COURT HEREBY ORDERS, ADJUDGES, AND DECREES AS FOLLOWS:**

26 1. The distribution of the funds associated with the settlement checks that were not
27 cashed, deposited, or otherwise negotiated, in the amount of \$25,181.45 to Legal Aid at Work, is
28 approved.

1 2. After entry of this Amendment to Final Approval Order and Judgment, pursuant to
2 California Code of Civil Procedure, Plaintiff shall submit the Amendment to Final Approval Order
3 and Judgment to the Judicial Council.

4 3. Upon the entry of this Order, the Action shall be closed.

5
6 Dated: 12/03/2025
7 _____



Honorable Theresa M. Traber
Judge of the Los Angeles Superior Court

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 450 North Brand Blvd., Suite 900, Glendale, California 91203.

On December 11, 2025, I served the foregoing document(s) described as: **NOTICE OF ENTRY OF JUDGMENT OR ORDER** on interested parties in this action as follows:

Christopher J. Kelly
RIMON, P.C.
100 Overlook Center, 2nd Floor
Princeton, NJ 08540
Service Emails: christopher.kelly@rimonlaw.com; tara.humma@rimonlaw.com

Attorneys for Defendant

[X] BY ELECTRONIC SERVICE

Pursuant to the Court's Order regarding Electronic Service, I caused the documents described above to be E-Served through Case Anywhere by electronically mailing a true and correct copy through Case Anywhere to the individual(s) listed above.

Chair, Judicial Council of California
(Civil Case Coordination)
455 Golden Gate Avenue, 5th Floor
San Francisco, California 94102-3688
Service Emails: coordination@jud.ca.gov, donna.newman@jud.ca.gov,
bernadine.adams@jud.ca.gov

[X] BY E-MAIL

The above-referenced document(s) was transmitted to the person(s) at the e-mail address(es) listed herein at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency
Web URL:
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] BY ONLINE SUBMISSION

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

1 **[X] STATE**

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

4 Executed on December 11, 2025, at Glendale, California.

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6 Geoffrey Varas
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