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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA CLARA

SASHA BALABANOFF, on behalf of  
herself and on behalf of all other aggrieved  
employees,

Plaintiff,

vs.

CLASSIC VACATIONS, LLC, a Nevada  
limited liability company; EXPEDIA, INC.,  
a Washington corporation; EXPEDIA  
GROUP, an entity of unknown form;  
CLASSIC CUSTOM VACATIONS, an  
entity of unknown form; and DOES 1  
through 50, inclusive,

Defendants.

Case No. 21CV392334

**ADDENDUM TO CLASS ACTION AND  
PAGA SETTLEMENT AGREEMENT**

This Addendum to the Class Action and Private Attorneys General Act of 2004 ("PAGA") Settlement Agreement ("Addendum") is made and entered into by and between Plaintiff Sasha Balabanoff ("Plaintiff"), individually and on behalf of all others similarly situated, on one hand, and Defendants Classic Vacations, LLC, Expedia Group, Inc., and Expedia, Inc. (collectively "Defendants"), on the other hand. Plaintiff and Defendant are jointly referred to in this Addendum as the "Settling Parties." This addendum modifies the Class Action and PAGA Settlement Agreement ("Agreement") previously entered into by the Settling Parties in the above entitled action and which is attached as Exhibit A to the Declaration of David Yeremian In Support of Motion for Preliminary Approval of the Class Action Settlement filed on September 11, 2023.

The Settling Parties agree to modify the terms of the Agreement as follows:

**The following replaces the language of paragraph 4.4.3:**

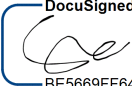
For any Class Member whose Individual Class Payment check or Individual PAGA Payment check is uncashed and cancelled after the void date, the Administrator shall distribute the funds to Bet Tzedek ("Cy Pres Recipient") pursuant to California Code of Civil Procedure Section 384, subd. (b). The Parties, Class Counsel and Defense Counsel represent that they have no interest or relationship, financial or otherwise, with the intended Cy Pres Recipient.

Other than as expressly modified herein, all provisions of the Agreement remain in effect and apply to this Addendum.

IT IS SO AGREED:

10/24/2023

Dated: \_\_\_\_\_

DocuSigned by:  
  
BE5669EE64D44A4

Plaintiff Sasha Balabanoff

Dated: 10/25/2023



David Yeremian & Associates, Inc.  
Counsel for Plaintiff  
Printed Name: David Yeremian

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Dated: 10/25/2023

  
D.Law  
Counsel for Plaintiff  
Printed Name: Emil Davtyan

Dated: \_\_\_\_\_

Defendant Classic Vacations, LLC

By: \_\_\_\_\_ (name)  
\_\_\_\_\_ (title)

Dated: \_\_\_\_\_

Seyfarth Shaw LLP  
Counsel for Defendant Classic Vacations, LLC  
Printed Name: Eric Steinert

Dated: \_\_\_\_\_

Defendants Expedia Group, Inc., and Expedia, Inc.

By: \_\_\_\_\_ (name)  
\_\_\_\_\_ (title)

Dated: \_\_\_\_\_

K&L Gates  
Counsel for Defendants Expedia Group, Inc.,  
and Expedia, Inc.  
Printed Name: Todd Nunn

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\_\_\_\_\_  
D.Law  
Counsel for Plaintiff  
Printed Name: Emil Davtyan

\_\_\_\_\_  
*Melissa Krueger*  
\_\_\_\_\_  
Defendant Classic Vacations, LLC  
By: Melissa Krueger (name)  
CEO (title)

\_\_\_\_\_  
*Eric Steinert*  
\_\_\_\_\_  
Seyfarth Shaw LLP  
Counsel for Defendant Classic Vacations, LLC  
Printed Name: Eric Steinert

\_\_\_\_\_  
Defendants Expedia Group, Inc., and Expedia, Inc.  
By: \_\_\_\_\_ (name)  
\_\_\_\_\_  
\_\_\_\_\_  
(title)

\_\_\_\_\_  
K&L Gates  
Counsel for Defendants Expedia Group, Inc.,  
and Expedia, Inc.  
Printed Name: Todd Nunn

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D.Law  
Counsel for Plaintiff  
Printed Name: Emil Davtyan

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Defendant Classic Vacations, LLC

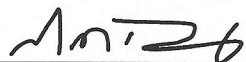
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9 By: \_\_\_\_\_ (name)

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Seyfarth Shaw LLP  
Counsel for Defendant Classic Vacations, LLC  
Printed Name: Eric Steinert

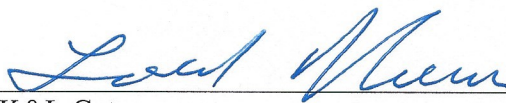
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\_\_\_\_\_  
  
Defendants Expedia Group, Inc., and Expedia, Inc.

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18 By: Melissa F. Day \_\_\_\_\_ (name)

19 Vice President, Employment Law \_\_\_\_\_ (title)

20  
21 Dated: 10-27-23

\_\_\_\_\_  
  
K&L Gates  
Counsel for Defendants Expedia Group, Inc.,  
and Expedia, Inc.  
Printed Name: Todd Nunn