

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
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 Plaintiff Cameron Santa Cruz

[Counsel for Farroz (Michael) Zamani on the next page]

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

CAMERON SANTA CRUZ, individually, and
on behalf of aggrieved employees pursuant to
the Private Attorneys General Act (“PAGA”);

Plaintiff,

v.

SUN WEST MORTGAGE COMPANY, INC.,
a California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 30-2022-01239675-CU-OE-CXC

Assigned for All Purposes to:
Honorable Melissa R. McCormick
Department CX-104

**SECOND SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (LABOR
CODE SECTIONS 2698, ET SEQ.)
SETTLEMENT AGREEMENT**

[Reservation ID: 74309732]

RELATED TO ROA NO. 260

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

Hearing Date: July 17, 2025
Hearing Time: 2:00 p.m.
Hearing Place: Department CX-104

Complaint Filed: January 4, 2022
Trial Date: None Set

1 JASON E. BAKER (SBN 197666)

2 JOHN J. WEBER (SBN 313824)

3 **KEEGAN & BAKER, LLP**

4 5820 Oberlin Drive, Suite 205

5 San Diego, California 92121

6 Telephone: (858) 558-9402/7

7 Facsimile: (858) 558-9401

8 *Attorneys for Plaintiff Farroz (Michael) Zamani in Case No. 30-2022-01255275-CU-OE-CXC*

Plaintiffs Cameron Santa Cruz and Farroz (Michael) Zamani (“Plaintiffs”) provide this second supplemental submission in response to the Court’s tentative ruling on the Motion for PAGA Approval originally scheduled for hearing on March 20, 2025. Prior to the Motion for PAGA Approval Hearing, the Court issued a tentative ruling ordering Plaintiffs and Defendant Sun West Mortgage Company, Inc. (“Defendant”) to make changes to the settlement documents that were submitted alongside the Motion for Approval of the PAGA Settlement Agreement.

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) The Amended Settlement Agreement states that plaintiffs Santa Cruz and Zamani, on the one hand, and defendant, on the other, are entering into the settlement to settle <i>Santa Cruz v. Sun West Mortgage Company, Inc.</i> , Case No. 2022-01239675 “(related to [Zamani v. Sun West Mortgage Company, Inc.] Case No. 2022-01255275-CU-OE-CXC).” The Amended Settlement Agreement defines the two lawsuits collectively as the “Lawsuit.” Do the parties intend the settlement also to settle the Zamani suit? If so, why does the settlement agreement not expressly so state? Relatedly, do the parties plan to dismiss the Zamani case? If so, when?	The Amended Settlement Agreement has been amended in the Amendment to Amended Settlement Agreement accordingly. (Second Supplemental Declaration of Douglas Han in Support of Motion for Approval of the PAGA Settlement Agreement (“Supp. Han Decl.”), ¶ 4; Exhibit 3, <i>supra</i> , at § 1.)
(2) In its October 24, 2024 order (ROA 234), the court stated the “Release of PAGA Claims” was overbroad. 10/24/24 Order (ROA	The Amended Settlement Agreement has been amended in the Amendment to Amended Settlement Agreement accordingly.

234) ¶ 10. The “Release of PAGA Claims” in the Amended Settlement Agreement remains overbroad. Releases for aggrieved employees other than plaintiffs should not release more than the civil penalties available under PAGA based on the facts alleged in the operative complaint and the notice letter to the LWDA. The phrases “or related to” and “or could have been alleged” should be removed.	(Supp. Han Decl., <i>supra</i>, at ¶ 5, Exhibits 3, <i>supra</i>, at § 2.)
(3) In its October 24, 2024 order (ROA 234), the court stated that if unique circumstances warrant the generous \$10,000 enhancement award plaintiff Santa Cruz seeks, the parties should describe those circumstances in their supplemental filing. 10/24/24 Order (ROA 234) ¶ 5. The parties did not address this issue in their supplemental filing. The court thus finds a \$5,000 enhancement award appropriate for plaintiff Santa Cruz.	The Amended Settlement Agreement has been amended in the Amendment to Amended Settlement Agreement accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 6; Exhibit 3, <i>supra</i>, at § 3.)
(4) In its October 24, 2024 order (ROA 234), the court stated that if unique circumstances warrant the generous attorneys’ fees award (i.e., 35% of the gross settlement amount) plaintiffs’ counsel seek, counsel should describe those circumstances in their supplemental filing. 10/24/24 Order (ROA 234) ¶ 7. Plaintiffs’ counsel states in counsel’s	The Amended Settlement Agreement has been amended in the Amendment to Amended Settlement Agreement accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 7; Exhibit 3, <i>supra</i>, at § 4.)

1 declaration that the purportedly “unique
2 circumstances” in this case warranting a 35%
3 attorneys’ fees award are: “(a) Plaintiffs’
4 Counsel drafted and propounded form
5 interrogatories, special interrogatories,
6 requests for production of documents, and
7 requests for 18 admission and reviewed the
8 responses; (b) Plaintiffs’ Counsel reviewing
9 and opposing Defendant’s Motion to Compel
10 Arbitration and Stay the Proceedings; and (c)
11 Plaintiffs’ Counsel working together to
12 properly settle two (2) lawsuits with the
13 settlement.” Supp. Han Decl. (ROA 246) ¶ 8.
14 None of these circumstances is unique. The
15 court thus finds an attorneys’ fee award of 33
16 1/3% of the gross settlement amount
17 appropriate in this case.

18 (5) On page 1 of the notice letter and
19 throughout the document “Operative
20 Complaint” should be revised to “Operative
21 Complaints.” In addition, the term “Action” in
22 the notice is unclear. It appears to be defined
23 to refer to both lawsuits. The notice should
24 make clear whether the settlement is settling
25 one or both lawsuits.

26 (6) Why is the discussion of class actions in
27 the third paragraph of section I of the notice

The explanatory letter has been modified accordingly.

(Supp. Han Decl., *supra*, at ¶ 8; Exhibit 4, *supra*, at p. 1)

The explanatory letter has been modified accordingly.

1 2 3	needed? It appears that paragraph could be removed, with the exception of the last sentence.	(Supp. Han Decl., <i>supra</i> , at ¶ 9; Exhibit 4, <i>supra</i> , at § I.)
4 5 6 7 8	(7) The amounts of attorneys' fees and plaintiff Santa Cruz's enhancement award in section V of the notice should be revised. In addition, the phrase "up to" should be removed throughout that section.	The explanatory letter has been modified accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 10; Exhibit 4, <i>supra</i> , at § V.)
9 10 11 12 13	(8) The first sentence of section VI of the notice states "your settlement payment is calculated to be about \$_____." Why will the amount of each individual payment be approximate when the notice letter is sent?	The explanatory letter has been modified accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 11; Exhibit 4, <i>supra</i> , at § VI.)
14 15 16 17 18	(9) The release in section VII of the notice is inconsistent with the release in the Amended Settlement Agreement which, in any event, must be revised as stated above.	The explanatory letter has been modified accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 12; Exhibit 4, <i>supra</i> , at § VII.)
19 20 21 22 23 24	(10) Proposed Order and Judgment.	The Proposed Order and Judgment has been amended throughout to reflect the changes set forth herein. (Supp. Han Decl., <i>supra</i> , at ¶ 13; Exhibit 5, <i>supra</i> , at p. 1, ¶¶ 5, 6, 9, 16, 21.)

1 Dated: June 27, 2025

JUSTICE LAW CORPORATION

2 By: 
3 Douglas Han
4 *Attorneys for Plaintiff Santa Cruz*

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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 Ave., Ste. 101 Pasadena, California 91103. My electronic service address is manderson@justicelawcorp.com

**SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT (LABOR CODE
SECTIONS 2698, ET SEQ.) SETTLEMENT AGREEMENT**

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 June 27, 2025, at Pasadena, California.

Moin! Andreas

Mariah Anderson