

**KINGSLEY SZAMET & LY**  
ERIC B. KINGSLEY, Esq. (SBN 185123)  
eric@kingsleylawyers.com  
LIANE KATZENSTEIN LY, Esq., (SBN 259230)  
liane@kingsleylawyers.com  
JESSICA BULAON, Esq. (SBN 340749)  
jessi@kingsleylawyers.com  
16133 Ventura Blvd., Suite 1200  
Encino, CA 91436  
Tel: (818) 990-8300, Fax (818) 990-2903

**ABRAMSON LABOR GROUP**  
WILLIAM ZEV ABRAMSON, Esq. (SBN 289387)  
wza@abramsonlabor.com  
11846 Ventura Blvd., Suite 100  
Studio City, CA 91604  
Tel: (213) 493-6300

Attorneys for Plaintiff and all aggrieved employees

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE**

ENMANUEL DE JESUS LOPEZ TORRES,  
an individual, on behalf of the State of  
California, as a private attorney general,

PLAINTIFF,

v.

MOUNTAIN VIEW COUNTRY CLUB,  
INC.; and DOES 1 thru 50, inclusive,

DEFENDANTS.

Case No. CVRI2105882

[Case Assigned for All Purposes to Hon. Harold  
W. Hopp in Dept. 10]

**SUPPLEMENTAL DECLARATION OF  
LIANE KATZENSTEIN LY IN SUPPORT  
OF MOTION FOR APPROVAL OF  
REPRESENTATIVE ACTION  
SETTLEMENT**

Date: June 6, 2024

Time: 8:30 a.m.

Dept.: 10

Complaint Filed: October 21, 2021

FAC Filed: March 3, 2022

Trial Date: None Set

1                                   **SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY**

2   I, Liane Katzenstein Ly, declare as follows:

3               1.       I am an attorney licensed to practice before all of the courts of the State of California.  
4   I am the attorney of record for Plaintiff Enmanuel De Jesus Lopez Torres in the above-entitled action.  
5   I have personal knowledge of the facts set forth herein, and if called upon as a witness, I could and  
6   would testify competently thereto.

7               2.       I graduated from Florida State University in 2005 with a degree in English. I  
8   graduated from University of California, Davis School of Law in 2008. I am admitted to practice  
9   before the following Courts: United States District Court, Northern, Southern, Eastern, and Central  
10   of California; all of California State Courts.

11              3.       I have been involved in all of the settlement discussions leading to the present  
12   settlement as embodied in the Joint Stipulation of PAGA Settlement (“Settlement”, “Agreement” or  
13   “Settlement Agreement”). I make this supplemental declaration in support of Plaintiff’s Motion for  
14   Approval of Representative Action in the above-captioned case and to address the Court’s concerns  
15   addressed at the May 9, 2024 hearing.

16                                   **MEDIATOR EXPERTISE**

17              4.       Henry J. Bongiovi has over twenty years experience as a litigator in both Los Angeles  
18   and Santa Barbara Counties, and is AV Rated (“5 out of 5”) by Martindale-Hubbell, as well as being  
19   rated Superb (“10 out of 10”) by AVVO.

20              5.       In 1998, Mr. Bongiovi became certified as a mediator after receiving formal  
21   mediation training.

22              6.       Thereafter, Mr. Bongiovi became a Special Settlement Master for the Santa Barbara  
23   Superior Court.

24              7.       Mr. Bongiovi was a member of the Santa Barbara County Superior Court’s first  
25   Alternative Dispute Resolution Committee, and is currently a Santa Barbara Superior Court  
26   CMADRESS Facilitator and in that capacity acts as a mediator.

27   ///

28   ///

1 **VALUE OF PAGA CLAIMS**

2 8. There are 236 aggrieved employees and about 145 of them are former employees/

3 9. At mediation we based our analysis on 5,802 pay periods, as that was the number of  
4 pay periods in the data produced at that time.

5 10. After the mediation and during the process of inking the settlement agreement, that  
6 number increased to 7,255 pay periods.

7 11. We provided the estimated number of pay periods involved for each claim. One  
8 penalty per pay period is \$725,500.00. The full exposure if all claims are stacked is \$2,508,100.00.

9 **ATTORNEYS' FEE SPLITTING AGREEMENT**

10 12. Kingsley Szamet & Ly, formerly Kingsley & Kingsley, APC, and Abramson Labor  
11 Group entered into a written co-counsel agreement, acknowledged by Plaintiff, that provides how the  
12 two firms will split any fee recovery awarded by the Court.

13 13. The fee split in this matter is 66 2/3% of any awarded fee to Kingsley Szamet & Ly and  
14 33 1/3% to Abramson Labor Group.

15 14. The fee-sharing agreement will not diminish the payments to Plaintiff and the aggrieved  
16 employees.

17 **SETTLEMENT ADMINISTRATOR**

18 15. The Parties selected Phoenix Class Action Administration Solutions to administer  
19 the settlement in this matter because they are the most cost-effective compared to the other bids that  
20 the Parties received from other administrators.

21 16. The other bid received was \$1,000.000 higher than Phoenix.

22 **PAGA COUNSEL'S REQUESTED REIMBURSEMENT OF CASE COSTS**

23 17. Class Counsel has simplified the cost ledger for the Court.

24 18. A true and correct copy of PAGA Counsel's cost ledger is attached hereto as Exhibit  
25 "A".

26 **PLAINTIFF'S REQUESTED ENHANCEMENT PAYMENT**

27 19. Plaintiff is requesting an enhancement payment of \$7,500.00, to be paid from the  
28 Gross Settlement Amount, in exchange for a release of all claims that arise from his employment

1 with Defendant and for the time, effort, risks, and expense incurred by Plaintiff in bringing this  
2 lawsuit forward on behalf of the PAGA Members.

3 20. Plaintiff's concurrently filed supplemental declaration in support of approval of the  
4 representative action settlement details the extensive time Plaintiff dedicated to this lawsuit.

5 **ADDENDUM TO PAGA SETTLEMENT AGREEMENT**

6 21. To address the Court's concern regarding the released parties in the PAGA  
7 Settlement Agreement, the Parties have amended the list of released parties in accordance with this  
8 Court's Case Management Order. A true and correct copy of the fully-executed Addendum to the  
9 PAGA Settlement Agreement is attached hereto as Exhibit "B."

10 **PROOF OF SUBMISSION TO THE LABOR AND WORKFORCE DEVELOPMENT**

11 **AGENCY**

12 22. As indicated on the Proof of Service, this supplemental Declaration was uploaded to  
13 the Labor and Workforce Development Agency's ("LWDA") website on the date this Declaration  
14 was filed. Proof of submission of Plaintiff's Declaration, all related documents, and copy of the  
15 email from the LWDA confirming receipt is attached hereto as Exhibit "C".

16 **EXHIBITS**

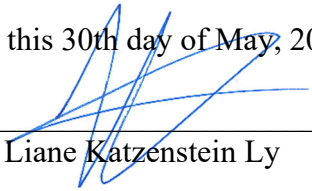
17 23. Attached hereto as Exhibit "A" is a true and correct copy of the Kingsley Szamet &  
18 Ly itemized costs ledger reflecting costs incurred in this matter.

19 24. Attached hereto as Exhibit "B" is a true and correct copy of the fully-executed  
20 Addendum to the PAGA Settlement Agreement.

21 25. Attached hereto as Exhibit "C" is a true and correct copy of the proof of submission  
22 of this supplemental filing to the LWDA.

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

25 This declaration was executed this 30th day of May, 2024, in Los Angeles, California.

26  
27   
28 \_\_\_\_\_  
Liane Katzenstein Ly

## **EXHIBIT "A"**

05-2024\_Mountain View Country Club Historic Cost Items for Kingsley Kingsley/Employment - 5/29/2024

Mountain View Country Club, Inc. adv. Lopez Torres, Enmanuel De Jesus - Cost Report

| Trialworks TaskCode | Amount      | Date Incurred | Payee              | Description                                                                                                                  | Notes                                                | Count of Docs | Expense Type        | Further Clarification on Costs                                                                         |
|---------------------|-------------|---------------|--------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------|---------------------|--------------------------------------------------------------------------------------------------------|
| Copies              | \$ 0.30     | 10/21/2021    | Paper Cut          |                                                                                                                              |                                                      | 0             |                     | Cost for copies of PAGA letter to mail to Defendant                                                    |
| Postage Cost        | \$ 7.33     | 10/21/2021    |                    |                                                                                                                              |                                                      | 0             | Postage Cost        | Cost for mailing of PAGA letter via certified mail service to Defendant                                |
| Filing Fee          | \$ 75.00    | 10/21/2021    | LWDA               | State of California - Department of Industrial Relations Customer Receipt _ Purchase Confirmation Mountain View Country Club |                                                      | 1             | Filing Fee          | Filing fee for PAGA Letter submission to the LWDA                                                      |
| Filing Fee          | \$ 1,489.69 | 10/22/2021    | One Legal          | OLINV#03616420 MVC 10.22.21                                                                                                  |                                                      | 1             | Filing Fee          | Complaint, Civil Case Cover Sheet and Summons filing fee                                               |
| Filing Fee          | \$ 14.41    | 10/29/2021    | One Legal          | OLINV#03633002 MVC 10.29.21                                                                                                  |                                                      | 1             | Filing Fee          | Ntc of ct's order re CMC and case assignment filing fee                                                |
| Postage Cost        | \$ 0.73     | 10/29/2021    |                    |                                                                                                                              |                                                      | 0             | Postage Cost        | Cost for mailing of Pl's ntc of Court's Order re CMC and Case Assignment via regular mail to Defendant |
| Copies              | \$ 0.60     | 10/29/2021    | Paper Cut          |                                                                                                                              |                                                      | 0             |                     | Costs for copies of Pl's ntc of court's Order re CMC and Case Assignment to mail to Defendant          |
| Filing Fee          | \$ 40.15    | 11/1/2021     | One Legal          | OLINV#03636811 MV 11.1.21                                                                                                    |                                                      | 1             | Filing Fee          | Ntc of Cts ntc of case assignment and CMC filing cost                                                  |
| Costs               | \$ 201.47   | 11/19/2021    | OnCall             | OCINV#235419 MVCC 11.19.21                                                                                                   |                                                      | 1             | Court Cost          | payment to appear for hearing via On-Call                                                              |
| Postage Cost        | \$ 7.33     | 12/1/2021     |                    |                                                                                                                              | mailing PAGA letter to Def Counsel via cert mailing. | 0             | Postage Cost        | Costs for mailing of Pl's PAGA letter via certified mail service to Defense Counsel                    |
| Copies              | \$ 0.30     | 12/1/2021     | Paper Cut          |                                                                                                                              |                                                      | 0             |                     | Cost for copies of Pl's PAGA letter to mail to Defense Counsel                                         |
| costs               | \$ 450.00   | 1/5/2022      | Clerk of the Court | Initial Filing Fee                                                                                                           |                                                      | 0             | Court Cost          | S&C initial filing fee                                                                                 |
| costs               | \$ 50.00    | 1/5/2022      | Clerk of the Court | Change of Venue Fee                                                                                                          |                                                      | 0             | Court Cost          | Court Fees required for transfer                                                                       |
| filing fee          | \$ 18.53    | 3/8/2022      | One Legal          | OLINV#03910414 MVC 3.8.22                                                                                                    |                                                      | 1             | Filing Fee          | Amd Complaint; Summons issued and filed costs                                                          |
| filing fee          | \$ 40.15    | 3/9/2022      | One Legal          | OLINV#03914811 MV 3.9.22                                                                                                     |                                                      | 1             | Filing Fee          | Ntc of Serving Ct's Ntc of CMC filing cost                                                             |
| filing fee          | \$ 17.41    | 3/15/2022     | One Legal          | OLINV#03926794 MVC 3.15.22                                                                                                   |                                                      | 1             | Filing Fee          | Ntc of ct's order filing cost                                                                          |
| filing fee          | \$ 42.98    | 3/17/2022     | One Legal          | OLINV#03936249 MV 3.17.22                                                                                                    |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 21.93    | 3/18/2022     | One Legal          | OLINV#03937617 MV 3.18.22                                                                                                    |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 21.93    | 4/6/2022      | One Legal          | OLINV#03979581 MV 4.6.22                                                                                                     |                                                      | 1             | Filing Fee          | Ntc of ct order filing cost                                                                            |
| filing fee          | \$ 42.72    | 4/6/2022      | One Legal          | OLINV#03981551 MV 4.6.22                                                                                                     |                                                      | 1             | Filing Fee          | Ntc of Serving Ct's Amd Ntc of Hearing filing cost                                                     |
| filing fee          | \$ 21.93    | 4/20/2022     | One Legal          | OLINV#04014885 MV 4.20.22                                                                                                    |                                                      | 1             | Filing Fee          | Ntc of ct order filing cost                                                                            |
| filing fee          | \$ 44.01    | 4/21/2022     | One Legal          | OLINV#04019621 MV 4.21.22                                                                                                    |                                                      | 1             | Filing Fee          | Ntc of Serving Ct's PAGA Case Management Order #1 filing cost                                          |
| filing fee          | \$ 20.90    | 6/7/2022      | One Legal          | OLINV#04126441 MVCC 6.7.22                                                                                                   |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 42.72    | 6/7/2022      | One Legal          | OLINV#04128941 MVC 6.7.22                                                                                                    |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 43.24    | 6/13/2022     | One Legal          | OLINV#04142010 MVC 6.13.22                                                                                                   |                                                      | 1             | Filing Fee          | 170.6 CCP filing cost                                                                                  |
| filing fee          | \$ 21.93    | 6/13/2022     | One Legal          | OLINV#04138951 MVC 6.13.22                                                                                                   |                                                      | 1             | Filing Fee          | 170.6 CCP filing cost                                                                                  |
| filing fee          | \$ 42.72    | 6/15/2022     | One Legal          | OLINV#04148258 MVC 6.15.22                                                                                                   |                                                      | 1             | Filing Fee          | Ntc of Serving Ct's Ntc of Dept Reassignment for all Purposes filing cost                              |
| costs               | \$ 58.00    | 7/1/2022      | Thomson Reuters    | billing period of 7/1/22-7/29/22                                                                                             |                                                      | 0             | Research Cost       |                                                                                                        |
| filing fee          | \$ 57.39    | 10/18/2022    | One Legal          | OLINV#04460059 MV 10.18.22                                                                                                   |                                                      | 1             | Filing Fee          | Pl's Opp to Def's MTC Arb and supporting docs filing cost                                              |
| filing fee          | \$ 20.90    | 10/20/2022    | One Legal          | OLINV#04465063 MV 10.20.22                                                                                                   |                                                      | 1             | Filing Fee          | Opp, Decl, RFJN filing cost                                                                            |
| filing fee          | \$ 20.90    | 10/21/2022    | One Legal          | OLINV#04470644 MV 10.21.22                                                                                                   |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 42.21    | 10/24/2022    | One Legal          | OLINV#04474987 MV 10.24.22                                                                                                   |                                                      | 1             | Filing Fee          | Case Management Statement filing cost                                                                  |
| filing fee          | \$ 20.90    | 10/25/2022    | One Legal          | OLINV#04478076 MV 10.25.22                                                                                                   |                                                      | 1             | Filing Fee          | Ntc of ct order filing cost                                                                            |
| filing fee          | \$ 42.47    | 10/26/2022    | One Legal          | OLINV#04482794 MV 10.26.22                                                                                                   |                                                      | 1             | Filing Fee          | Ntc of Serving Ct's Ntc of Dept Reassignment for all Purposes filing cost                              |
| costs               | \$ 520.06   | 11/9/2022     | Thomson Reuters    | billing period of 8/1/22-8/31/22                                                                                             |                                                      | 0             | Research Cost       |                                                                                                        |
| costs               | \$ 450.00   | 12/12/2022    | Huseby             | Huseby INV#763399 Mountain View Country Club paid 12.12.22                                                                   |                                                      | 1             | Court Reporter Cost |                                                                                                        |

# 05-2024\_Mountain View Country Club Historic Cost Items for Kingsley Kingsley/Employment - 5/29/2024

|              |    |            |                             |                                 |   |                |                                                               |
|--------------|----|------------|-----------------------------|---------------------------------|---|----------------|---------------------------------------------------------------|
|              |    |            | Riverside - Doc             | Transaction Receipt from SMT    |   |                |                                                               |
|              |    |            |                             | Court Epay Fine Pmt for \$1.00  |   |                | cost to retrieve copy of case related document from Court's   |
| costs        | \$ | 1.00       | 1/20/2023 retrieval fee     | (USD)                           | 1 | Court Cost     | docket                                                        |
| filing fee   | \$ | 20.33      | 2/2/2023 One Legal          | OLINV#04723481 MV 2.2.23        | 1 | Filing Fee     | supplemental filing cost                                      |
| filing fee   | \$ | 42.47      | 2/3/2023 One Legal          | OLINV#04728434 MV 2.3.23        | 1 | Filing Fee     | Pl's suppl brief In Opp to Def's MTC Arb filing cost          |
| filing fee   | \$ | 21.36      | 5/1/2023 One Legal          | OLINV#04954565 MV 5.1.23        | 1 | Filing Fee     | proposed order (after hearing) Proof of Service filing cost   |
| filing fee   | \$ | 17.45      | 5/1/2023 One Legal          | OLINV#04954036 MV 5.1.23        | 1 | Filing Fee     | proposed order (after hearing) filing cost                    |
| filing fee   | \$ | 42.72      | 5/2/2023 One Legal          | OLINV#04959135 MV 5.2.23        | 1 | Filing Fee     | proposed order denying def's MTC arb filing cost              |
| filing fee   | \$ | 42.98      | 5/2/2023 One Legal          | OLINV#04959110 MV 5.2.23        | 1 | Filing Fee     | proposed order denying def's MTC arb filing cost              |
| filing fee   | \$ | 42.21      | 5/16/2023 One Legal         | OLINV#04996314 MV 5.16.23       | 1 | Filing Fee     | Case Management Statement filing cost                         |
| filing fee   | \$ | 21.36      | 5/17/2023 One Legal         | OLINV#04997098 MV 5.17.23       | 1 | Filing Fee     | Case Management Statement filing cost                         |
|              |    |            |                             | JAMS Deposit Request 6696084    |   |                |                                                               |
| costs        | \$ | 8,153.78   | 6/7/2023 JAMS               | MV paid 6.7.23                  | 1 | Mediation Cost |                                                               |
| filing fee   | \$ | 17.45      | 7/11/2023 One Legal         | OLINV#05135544 MV 7.11.23       | 1 | Filing Fee     | Ntc of ct order filing cost                                   |
|              |    |            |                             |                                 |   |                | Ntc of Serving Cts Ntc of Dept. Reassignment for all Purposes |
| filing fee   | \$ | 42.47      | 7/11/2023                   | OLINV#14705922 MV 7.11.23       | 1 | Filing Fee     | filing cost                                                   |
| filing fee   | \$ | 21.36      | 7/11/2023 One Legal         | OLINV#05136767 MV 7.11.23       | 1 | Filing Fee     | Ntc of court's order filing cost                              |
|              |    |            |                             |                                 |   |                | Ntc of Serving Ct's Ntc of Dept Reassignment for all Purposes |
| filing fee   | \$ | 42.47      | 7/11/2023 One Legal         | OLINV#14705921 MV 7.11.23       | 1 | Filing Fee     | filing cost                                                   |
|              |    |            |                             | Bongiovi Mediation INV Re       |   |                |                                                               |
|              |    |            |                             | (Enmanuel de Jesus Lopez Torres |   |                |                                                               |
|              |    |            |                             | et al. v. Mountain View Country |   |                |                                                               |
|              |    |            |                             | Club Inc.) paid 8.7.23          |   |                |                                                               |
| costs        | \$ | 6,000.00   | 8/7/2023 Bongiovi Mediation | Club Inc.) paid 8.7.23          | 1 | Mediation Cost |                                                               |
| filing fee   | \$ | 22.39      | 8/14/2023 One Legal         | OLINV#05228631 MV 8.14.23       | 1 | Filing Fee     | Case Management Statement filing cost                         |
| costs        | \$ | (7,500.00) | 8/17/2023 JAMS refund       | JAMS refund                     | 1 | Reimbursement  |                                                               |
| filing fee   | \$ | 51.48      | 8/22/2023 One Legal         | OLINV#05250413 MV 8.22.23       | 1 | Filing Fee     | Case Management Statement filing cost                         |
|              |    |            |                             |                                 |   |                | Cost for sending ntc of mediation to client for review and    |
| Postage Cost | \$ | 5.80       | 8/23/2023 DocuSign          | ntc of mediation to client      | 0 | Postage Cost   | signature                                                     |
|              |    |            |                             | Berger Consulting INV# 10493 re |   |                |                                                               |
| costs        | \$ | 1,520.00   | 1/31/2024 Berger Consulting | MVCC paid 1.31.24               | 1 | Expert Fee     |                                                               |
| filing fee   | \$ | 19.30      | 2/13/2024 One Legal         | OLINV#05732712 MV 2.13.24       | 1 | Filing Fee     | Case Management Statement filing cost                         |
| filing fee   | \$ | 51.48      | 2/15/2024 One Legal         | OLINV#05744129 MV 2.15.24       | 1 | Filing Fee     | Case Management Statement filing cost                         |
|              |    |            |                             |                                 |   |                | Cost for sending client declaration in support of approval    |
| Postage Cost | \$ | 5.80       | 3/22/2024 DocuSign          | client dec                      | 0 | Postage Cost   | motion for review and signature                               |
| filing fee   | \$ | 51.48      | 4/4/2024 One Legal          | OLINV#05883825 MV 4.4.24        | 1 | Filing Fee     | Ntc of Change of Firm Name filing cost                        |
| filing fee   | \$ | 19.30      | 4/10/2024 One Legal         | OLINV#05901910 MV 4.10.24       | 1 | Filing Fee     | Ntc of Change of Firm Name filing cost                        |
| filing fee   | \$ | 81.07      | 4/17/2024 One Legal         | OLINV#05926379 MV 4.17.24       | 1 | Filing Fee     | Mtn fpr Approval of PAGA Settlement filing cost               |
| filing fee   | \$ | 77.21      | 4/17/2024 One Legal         | OLINV#05926066 MV 4.17.24       | 1 | Filing Fee     | Mtn fpr Approval of PAGA Settlement filing cost               |
| filing fee   | \$ | 51.48      | 4/18/2024 One Legal         | OLINV#05929750 MV 4.18.24       | 1 | Filing Fee     | Proposed order (hearing) Proof of E-Service filing cost       |
| filing fee   | \$ | 51.48      | 4/18/2024 One Legal         | OLINV#05929833 MV 4.18.24       | 1 | Filing Fee     | Proposed order (hearing) Proof of E-Service filing cost       |
| filing fee   | \$ | 15.39      | 4/18/2024 One Legal         | OLINV#05927693 MV 4.18.24       | 1 | Filing Fee     | Proposed order (hearing) Proof of E-Service filing cost       |
| filing fee   | \$ | 19.30      | 4/24/2024 One Legal         | OLINV#05946396 MV 4.24.24       | 1 | Filing Fee     | Proposed order (hearing) Proof of E-Service filing cost       |

## **EXHIBIT "B"**

**SLOVAK BARON EMPEY MURPHY & PINKNEY LLP**

Quynhvi (Vee) B. Sotelo, Esq. (SBN 225805)

[sotelo@sbemp.com](mailto:sotelo@sbemp.com)

Ryan A. Quadrel, Esq. (SBN 308311)

[quadrel@sbemp.com](mailto:quadrel@sbemp.com)

Katelyn K. Empey, Esq. (SBN 292110)

[kempey@sbemp.com](mailto:kempey@sbemp.com)

1800 East Tahquitz Canyon Way

Palm Springs, CA 92262

Tel: (760) 322-2275

Attorneys for Defendant

**KINGSLEY & KINGSLEY, APC**

ERIC B. KINGSLEY, Esq. (SBN 185123)

[eric@kingsleykingsley.com](mailto:eric@kingsleykingsley.com)

LIANE KATZENSTEIN LY, Esq., (SBN 259230)

[liane@kingsleykingsley.com](mailto:liane@kingsleykingsley.com)

16133 Ventura Blvd., Suite 1200

Encino, CA 91436

Tel: (818) 990-8300, Fax (818) 990-2903

**ABRAMSON LABOR GROUP**

WILLIAM ZEV ABRAMSON, Esq. (SBN 259230)

[wza@abramsonlabor.com](mailto:wza@abramsonlabor.com)

11846 Ventura Blvd., Suite 100

Studio City, CA, 91604

Tel: (213) 493-6300, Fax: (213) 382-4083

Attorneys for Plaintiff and the aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF RIVERSIDE**

ENMANUEL DE JESUS LOPEZ TORRES

an individual, on behalf of the State of  
California, as a private attorney general,

PLAINTIFF,

v.

MOUNTAIN VIEW COUNTRY CLUB,  
INC.; and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. CVRI2105882

[Case Assigned for All Purposes to Hon. Harold  
W. Hopp in Dept. 1]

**ADDENDUM TO JOINT STIPULATION  
OF PAGA SETTLEMENT**

Complaint Filed: October 21, 2021

FAC Filed: March 3, 2022

**ADDENDUM TO JOINT STIPULATION OF PAGA SETTLEMENT**

This Addendum to the Parties' Joint Stipulation of PAGA Settlement ("Addendum") is made and entered into on May 21, 2024, by and between Plaintiff Enmanuel De Jesus Torres ("Plaintiff") and Defendant Mountain View Country Club, Inc. ("Defendant"). Plaintiff and Defendant are collectively referred to herein as "the Parties". This Addendum amends and modifies that certain Joint Stipulation of PAGA Settlement dated March 12, 2024 made and entered into by the Parties as follows:

1. Paragraph 23 is entirely replaced as follows: "Released Parties" means Defendant Mountain View Country Club, Inc., and its officers, directors, employees, managers and agents.

2. All other provisions of the Joint Stipulation of PAGA Settlement remain in full force and effect, other than any provision that conflicts with the terms and spirit of this Addendum, which shall be deemed to be amended appropriately in order to be consistent with this Addendum.

IN WITNESS WHEREOF, the Parties have executed this Addendum on the date first written above.

DATED: May 23, 2024

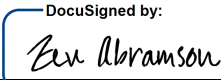
KINGSLEY & KINGSLEY, APC

By: 

Liane Katzenstein Ly  
Attorneys for Plaintiff Enmanuel de Jesus Lopez  
Torres and the aggrieved employees

DATED: May 23, 2024

ABRAMSON LAW GROUP

By: 

DocuSigned by:  
William Zev Abramson  
27C2307883934A2...  
Attorneys for Plaintiff Enmanuel de Jesus Lopez  
Torres and the aggrieved employees

1  
2 DATED: May 22, 2024

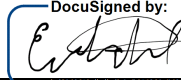
SLOVAK BARON EMPEY MURPHY &  
PINKNEY LLP

3  
4 By: Ryan A. Quadrel

5 Ryan A. Quadrel  
6 Attorneys for Defendant Mountain View Country  
Club, Inc.

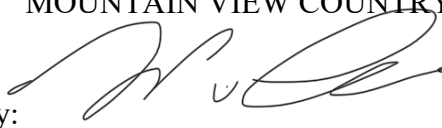
7 DATED: May 22, 2024

ENMANUEL DE JESUS LOPEZ TORRES

8  
9 By:   
10 Enmanuel De Jesus Lopez Torres  
11

12 DATED: May 22, 2024

MOUNTAIN VIEW COUNTRY CLUB, INC.

13 By:   
14 Michael Tovian, Board President  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **EXHIBIT "C"**

(Proof of Submission to LWDA)

(PROOF OF SERVICE)  
[CCP 1013(a)(3)]

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 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 30, 2024, I served all interested parties in this action the following documents described as: **SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY IN SUPPORT OF MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

David B. Mulé  
Jana B. FitzGerald  
[dmule@fitzgeraldmulelaw.com](mailto:dmule@fitzgeraldmulelaw.com)  
[jfitzgerald@fitzgeraldmulelaw.com](mailto:jfitzgerald@fitzgeraldmulelaw.com)  
**FITZGERALD & MULÉ LLP**  
74770 Hwy. 111, Suite 205  
Indian Wells, CA 92211

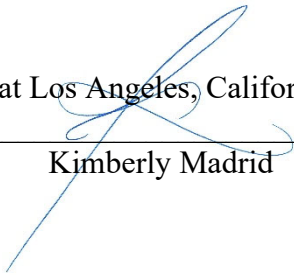
**ABRAMSON LABOR GROUP**  
William Zev Abramson  
[Wza@abramsonlabor.com](mailto:Wza@abramsonlabor.com)  
11846 Ventura Blvd., Suite 100  
Studio City, CA 91604

**[XX] BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

**[XX] (BY ELECTRONIC MAIL TRANSMISSION):** I caused the document to be sent to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

**[XX] (STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 30, 2024, at Los Angeles, California.

  
\_\_\_\_\_  
Kimberly Madrid