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Attorneys for Plaintiff ROBERT BRITO
on behalf of himself and on behalf of all other
aggrieved employees

[Additional counsel and party listed on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

ROBERT BRITO, on behalf of himself and on
behalf of all other aggrieved employees,

Plaintiff,

v.

BROTHERS INTERNATIONAL DESSERTS
dba BROTHERS INTERNATIONAL
DESSERTS INC., a California Corporation;
and DOES 1 through 50,
inclusive,

DEFENDANT.

Case No. 30-2022-01242515-CU-OE-CXC

ASSIGNED FOR ALL PURPOSES TO JUDGE
WILLIAM D. CLASTER, DEPT. CX101

**ADDENDUM TO THE PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT**

Lindley Fraley (CASBN 223421)
FORWARD COUNSEL LLP
4340 Von Karman Avenue, Suite 380
Newport Beach, California 92660
Telephone: (949) 258-9359
Facsimile: (949) 273-1070

Attorneys for Defendant BROTHERS INTERNATIONAL DESSERTS dba BROTHERS
INTERNATIONAL DESSERTS INC., a California Corporation

1 This Addendum to the Private Attorneys General Act (“PAGA”) Settlement Agreement.
2 (“Addendum”) is made and entered into by and between Plaintiff ROBERT BRITO (“**PAGA**
3 **Representative**”), individually and on behalf of the aggrieved employees, on the one hand, and
4 Defendant Brothers International Desserts dba Brothers International Desserts Inc. (“**Defendant**”),
5 on the other hand. PAGA Representative and Defendant are jointly referred to in this Addendum as
6 the “Settling Parties.” This addendum modifies the PAGA Settlement (“Agreement”) previously
7 entered into by the Settling Parties in the above entitled action and which is attached as Exhibit 1 to
8 the Declaration of David Yeremian In Support of Motion for Motion to Approve the PAGA
9 Settlement and Release Under California Labor Code §§ 2698 *et seq.* filed on November 20, 2023.

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

11 **The following replaces section 5.2:**

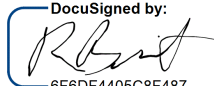
12 All Aggrieved Employees are deemed to release, on behalf of themselves and their respective
13 former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns,
14 the Released Parties from all claims for PAGA penalties that were alleged, or reasonably could have
15 been alleged, based on the PAGA Period facts stated in the Operative Complaint and the PAGA
16 Notice.

17 **Section 9.1 is to be deleted**

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

20 IT IS SO AGREED:

21 DATED: January ²⁰__, 2024

22 By: 
23 Robert Brito
24 Plaintiff
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DATED: ^{February} ~~January~~ 21, 2024

BROTHERS INTERNATIONAL DESSERTS
dba BROTHERS INTERNATIONAL
DESSERTS INC.

By: 

Defendant

DATED: January __, 2024

DAVID YEREMIAN & ASSOCIATES, INC.

By: _____
David Yeremian

Attorneys for Plaintiff
Robert Brito

DATED: January __, 2024

D.LAW, INC.

By: _____
Emil Davtyan

Attorneys for Plaintiff
Robert Brito

DATED: January __, 2024

FORWARD COUNSEL LLP

By: _____
Lindley Fraley

Attorneys for Defendant
Defendant Brothers International Desserts dba
Brothers International Desserts Inc.

1 DATED: January __, 2024

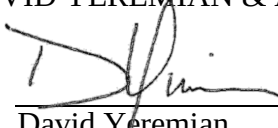
BROTHERS INTERNATIONAL DESSERTS
dba BROTHERS INTERNATIONAL
DESSERTS INC.

2
3 By: _____

4 Defendant

5 DATED: February 20, 2024

6 DAVID YEREMIAN & ASSOCIATES, INC.

7 By:  _____
8 David Yeremian

9 Attorneys for Plaintiff
Robert Brito

10 DATED: February 20, 2024

D.LAW, INC.

11 By:  _____
12 Emil Davtyan

13 Attorneys for Plaintiff
Robert Brito

14 DATED: January __, 2024

FORWARD COUNSEL LLP

15
16 By: _____
Lindley Fraley

17 Attorneys for Defendant
18 Defendant Brothers International Desserts dba
19 Brothers International Desserts Inc.

1 DATED: January __, 2024

BROTHERS INTERNATIONAL DESSERTS
dba BROTHERS INTERNATIONAL
DESSERTS INC.

3 By: _____

4 Defendant

5 DATED: January __, 2024

DAVID YEREMIAN & ASSOCIATES, INC.

7 By: _____
David Yeremian

8 Attorneys for Plaintiff
9 Robert Brito

10 DATED: January __, 2024

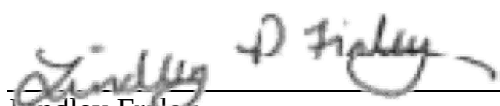
D.LAW, INC.

11 By: _____
12 Emil Davtyan

13 Attorneys for Plaintiff
14 Robert Brito

DATED: February 20, 2024

FORWARD COUNSEL LLP

16 By:  _____
Lindley Fraley

17 Attorneys for Defendant
18 Defendant Brothers International Desserts dba
19 Brothers International Desserts Inc.