

DOUGLAS HAN (SBN 232858)  
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*Attorneys for Plaintiff Blanca Sanchez*

[Counsel for Plaintiff Francisco Birrueta on the following page]

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

BLANCA SANCHEZ, individually, and on  
behalf of other members of the general public  
similarly situated;

Plaintiff,

v.

CARPENTER CO. d/b/a E.R. CARPENTER  
COMPANY, INC., a Virginia corporation; and  
DOES 1 through 100, inclusive;

Defendants.

Case No.: RIC2004219  
[Consolidated With Case No. CVRI2200511]

Assigned for All Purposes to:  
Honorable Harold W. Hopp  
Department 1

**CLASS ACTION**

**SUPPLEMENTAL BRIEF IN SUPPORT  
OF PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

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

Hearing Date: September 13, 2024  
Hearing Time: 8:30 a.m.  
Hearing Place: Department 1

Complaint Filed: October 20, 2020  
FAC Filed: November 16, 2021  
SAC Filed: January 6, 2022  
Trial Date: None Set

1 FRANCISCO BIRRUETA, as an individual and  
2 on behalf of all similarly situated employees,

3 Plaintiff,

4 v.

5 CARPENTER CO. WHICH WILL DO  
6 BUSINESS IN CALIFORNIA AS E.R.  
7 CARPENTER COMPANY, and DOES 1  
through 50, inclusive,

8 Defendants.

Case No.: CVRI2200511  
[Consolidated With Case No. RIC2004219]

Complaint Filed: February 7, 2022

1 KEVIN MAHONEY (SBN 235367)

2 **MAHONEY LAW GROUP, APC**

3 249 East Ocean Blvd., Suite 814

4 Long Beach, California 90802

5 Telephone: (562) 590-5550

6 Facsimile: (562) 590-8400

7 *Attorneys for Plaintiff Francisco Birrueta*

Plaintiffs Blanca Sanchez and Francisco Birrueta (“Plaintiffs”) provide this supplemental submission in response to the Court’s ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on August 6, 2024. Prior to the Preliminary Approval Hearing, the Court issued a tentative ruling instructing the Parties to address three (3) points set forth in the tentative ruling. The Parties appeared at the Preliminary Approval Hearing on August 6, 2024 at 8:30 a.m. and addressed the three (3) points set forth in the tentative ruling. The Court was satisfied with the second point in the tentative ruling being addressed and instructed the Parties to submit supplemental documents addressing the first and third points. The Preliminary Approval Hearing was continued to September 13, 2024 at 8:30 a.m., and the Court instructed the Parties to submit the supplemental documents by September 5, 2024 by 4:00 p.m.

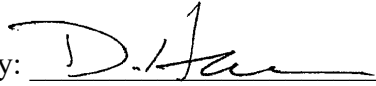
The chart below lists each of the Court’s issues and the revisions/submissions made to address each issue.

| <b>Ruling</b>                                                                                                                                                                                                                                                                                                                              | <b>Revisions/Submissions</b>                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (1) Definition of released parties includes more than those listed in the CMO (parent entities, related entities, DBAs, current and former management companies, shareholders, owners, attorneys, predecessors, successors, assigns, subsidiaries and affiliates). Who are we concerned about releasing by using such a broad description? | The Settlement Agreement has been amended accordingly.<br><br>(Supplemental Declaration of Douglas Han in Support of Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 3; Exhibit 2, § 1.43.) |
| (2) Notice is confusing—says class members may object to motions for final approval and for fees, expenses and service awards but these motions won’t be filed until after the                                                                                                                                                             | The Class Notice was modified accordingly.<br><br>(Supp Han Decl., <i>supra</i> , at ¶ 4; Exhibit 4, §§ 8, 10.)                                                                                                               |

1 deadline to object to the settlement. Revise  
2 notice to require settlement administrator to  
3 notify any person who objects to the  
4 settlement if the hearing on final approval is  
5 rescheduled.

6  
7 Dated: August 21, 2024

**JUSTICE LAW CORPORATION**

8 By:   
9 Douglas Han  
10 *Attorney for Plaintiff*  
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**PROOF OF SERVICE  
1013A(3) CCP**

**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 751 N. Fair Oaks Ave., Ste. 101 Pasadena, California 91103. My electronic service address is manderson@justicelawcorp.com

On August 21, 2024, I served the foregoing document described as

**SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

for the following case: **Sanchez, et al. v. Carpenter Co. d/b/a E.R. Carpenter  
Company, Inc., et al.**  
LWDA/Court Case No.: **LWDA-CM-848222-21  
RIC2004219 [Consolidated with Case No. CVRI2200511]  
Riverside County Superior Court**

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 August 21, 2024, at Pasadena, California.



\_\_\_\_\_  
Mariah Anderson