

ADDENDUM TO PAGA SETTLEMENT AGREEMENT

This Addendum to PAGA Settlement Agreement is made by and between (1) Plaintiff JESUS MARTINEZ (“Plaintiff”), on behalf of himself and other Aggrieved Employees, and as a representative of the State of California, and (2) Defendants JOHN S. DOE, JONDO LTD and JONDO HOLDINGS LLC, JONDO GLOBAL HOLDINGS, INC. (collectively “Defendant”).

The following provision hereby replaces the original provision set forth as paragraph 1.T. on pages 2-3 of the PAGA Settlement Agreement regarding the definition of “Released Claims:”

- T. “Released Claims” means any and all claims asserted and unasserted arising during the PAGA Period for civil penalties under California Labor Code section 2698, *et seq.*, as well as any interest, fees, and costs available under PAGA, based on the factual allegations in the Action and in Plaintiff’s January 17, 2022, PAGA letter including, but not limited to, for failure to pay wages, failure to pay overtime, failure to provide compliant meal periods and associated premiums, failure to provide compliant rest periods and associated premiums, failure to timely pay wages during employment, failure to timely pay wages upon termination, failure to provide compliant wage statements, failure to maintain requisite payroll records, failure to indemnify or reimburse for business expenses, and for violations of Labor Code sections 201, 202, 203, 226(a), 226.3, 226.7, 226.8, 246.5, 510, 551, 552, 558, 558.1, 1102.5, 1174, 1174.5, 1194, 1199, and 6409.6, and all applicable Wage Orders. With respect to any successor-in-interest, the Released Claims as defined herein includes only successor liability PAGA claims against the successor, and does not include PAGA claims arising from the successor’s own conduct.

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EXECUTION BY PARTIES AND COUNSEL

The Parties and their counsel hereby knowingly and voluntarily execute this Settlement Agreement as set forth below.

Dated: 10/14/24, 2024



JESUS MARTINEZ

Dated: 10-14-24, 2024



JOHN S. DOE

Dated: 10-14-24, 2024

JONDO LTD
JONDO HOLDINGS LLC
JONDO GLOBAL HOLDINGS, INC.

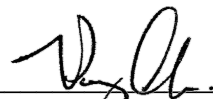
By: 

John S. Doe

Approved as to form and content

Dated: 10/14/24, 2024

CHAMI LAW, PC

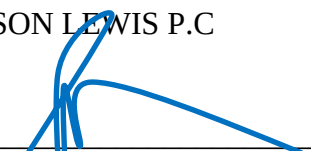
By: 

Pouya B. Chami, Esq.
Pablo F. Colmenares, Esq.

Attorneys for Plaintiff
JESUS MARTINEZ

Dated: October 14, 2024

JACKSON LEWIS P.C

By: 

Scott C. Lacunza, Esq.

Attorneys for Defendants
JOHN S. DOE, JONDO, LTD, JONDO
HOLDINGS LLC and JONDO GLOBAL
HOLDINGS, INC.