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and NANCY GIULIANO

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16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

18 MANUEL ARELLANO MARTINEZ, an
individual and class representative on behalf
19 of himself and all other similarly situated
non-exempt former and current employees,

20 Plaintiff,

21 vs.

22 GIULIANO-PAGANO CORPORATION, a
23 California Corporation; NANCY
GIULIANO, an individual; and DOES 1
24 through 100, inclusive,

25 Defendants.

Case No: 22STCV07482
Hon.: HON. ELIHU M. BERLE
Dept.: 6 (SSC)

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
GRANT JOSEPH SAVOY, ESQ. IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT AND
CLASS NOTICE**

Date: December 8, 2025
Time: 11:00AM
Dept.: 6 SSC

Complaint Filed: March 2, 2022
Trial Date: None Set.

1 **SUPPLEMENTAL DECLARATION OF GRANT JOSEPH SAVOY, ESQ.**

2 I, Grant Joseph Savoy, hereby declare as follows:

3 1. I am an attorney at law duly licensed to practice in the State of California. I am
4 the principal of Solouki | Savoy, LLP and counsel of record for Plaintiff Manuel Arellano
5 Martinez (“Plaintiff” and/or “Martinez”) in the above-captioned matter. I make this
6 Supplemental Declaration on the basis of personal firsthand knowledge unless another source of
7 information or belief clearly appears from the context, and as to all such matters, I believe them
8 to be true. If called as a witness, I could and would readily and competently testify to all
9 matters stated herein.

10 2. I make this Supplemental Declaration in response to the Court’s August 8, 2025
11 Orders at the previous hearing on Plaintiffs’ Motion for Preliminary Approval of Class Action
12 and PAGA Settlement Agreement and Class Notice (“Settlement” and/or “Agreement”).

13 3. In compliance with the Court’s August 8, 2025 Orders, the Parties have worked
14 together to address the issues identified as they pertain to the Settlement Agreement, associated

15 4. Notice of Settlement, and other settlement deficiencies. A true and accurate copy
16 of the executed Revised Settlement Agreement is attached hereto as **Exhibit A**. Further, as
17 ordered by the Court, a red line tracked copy of the Revised Settlement Agreement is attached
18 hereto as **Red Line Exhibit A**.

19 5. The other issues identified by the Court in its August 8, 2025 Order are addressed
20 by the undersigned in the concurrently filed Supplemental Brief In Support of Motion for
21 Preliminary Approval, as well as in documents submitted by Defendant.

22 **Notice to the Labor and Workforce Development Agency**

23 6. On or about October 31, 2025, Plaintiff submitted a copy of the Supplemental
24 Preliminary Approval documents, including the Revised Settlement Agreement, with the Labor
25 and Workforce Development Agency (“LWDA”) via the LWDA Online PAGA Filing Portal.
26 A true and accurate copy of the Electronic Submission Reciept is attached hereto as **Exhibit B**.

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I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct. Executed on December 31, 2025, at Los Angeles, California.

/s/ Grant Joseph Savoy
GRANT JOSEPH SAVOY