

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
JOHN BICKFORD (SBN 280929)
JUSTICE LAW CORPORATION
751 N. Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SERENA JONES, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

v.

AMADA WELD TECH, INC. f/k/a
AMADA MIYACHI AMERICA, INC., a
Delaware corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 21STCV33989

Assigned for All Purposes to:
Honorable David S. Cunningham III
Department 11

CLASS ACTION

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN
SUPPORT OF PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

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

Hearing Date: January 18, 2023
Hearing Time: 9:30 a.m.
Hearing Place: Department 11

Complaint Filed: September 13, 2021
FAC Filed: June 23, 2022
Trial Date: None Set

Plaintiff Serena Jones (“Plaintiff”) provides this supplemental submission in response to the Court’s tentative ruling on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on October 19, 2022. On October 19, 2022, prior to the scheduled preliminary approval hearing, the Court issued a tentative ruling ordering Plaintiff and Defendant Amada Weld Tech, Inc. (“Defendant”) to make several changes to the Joint Stipulation and Settlement Agreement (“Settlement” or “Settlement Agreement”) and Notice of Class and Representative Action Settlement (“Class Notice”).

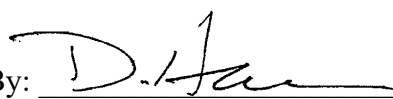
The chart below lists each of the Court’s concerns from the tentative ruling and the revisions/submissions made to address each concern.

Ruling	Revisions/Submissions
Modify the release of class claims to specify that Class Members will only release claims alleged in, or arising out of facts asserted in, the operative First Amended Complaint. See ¶¶ I.L, I.II.	The Settlement Agreement has been amended accordingly. (Supplemental Declaration of Douglas Han in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 4; Exhibit 2, ¶¶ I (L), I (II).)
The release of PAGA claims should be limited to claims for penalties that were brought or could have been brought based on the facts alleged in Plaintiff’s LWDA letter. See ¶ I.DD.	The Settlement Agreement has been amended accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 5; Exhibit 2, <i>supra</i> , at ¶ I (DD).)
Modify the effective date of the releases to be the date on which Defendant fully funds the settlement. See ¶¶ III.L, III.M.	The Settlement Agreement and Class Notice have been amended accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 6; Exhibit 2, <i>supra</i> , at ¶¶ III (L), III (M); Exhibit 3, § 9.)
Ensure the notice accurately reflects the	The Class Notice has been amended

Court's current social distancing procedures for attendance at hearings and review of court files. (Counsel should check the Court website for most current information.)	accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 7; Exhibit 3, <i>supra</i>, at §§ 12, 14.)
The class and PAGA releases disclosed to Class Members in the notice should be verbatim to the releases in the Settlement Agreement.	The Class Notice has been amended accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 8; Exhibit 3, <i>supra</i>, § 9.)
Provide proof of submission of the proposed settlement agreement to the LWDA. (Lab. Code, § 2699, subd. (1)(2).) This also applies to any further revised versions of the settlement agreement.	The Amended Settlement Agreement has been submitted to the LWDA. (Supp. Han Decl., <i>supra</i>, at ¶ 9; Exhibit 6.)

Dated: November 2, 2022

JUSTICE LAW CORPORATION

By: 
Douglas Han
Shunt Tatavos-Gharajeh
John Bickford
Attorneys for Plaintiff

**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 Avenue, Suite 101, Pasadena, CA 91103 and my electronic service address is manderson@justicelawcorp.com

On November 2, 2022, I served the foregoing document described as

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

for the following case: **Jones v. Amada Weld Tech, Inc f/k/a Amada Miyachi
America, Inc.**
LWDA/Court Case No.: **LWDA Case No.: CM- 877852-22
Court Case No.: 21STCV33989
Los Angeles 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 November 2, 2022, at Pasadena, California.



Mariah Anderson