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Geysimonyan and Brandon Warren

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

GEORGE GEVORK GEYSIMONYAN, and
BRANDON WARREN, individually, and on behalf
of all others similarly situated,

Plaintiffs,

vs.

CELLCO PARTNERSHIP; and DOES 1 through 10,
inclusive,

Defendants

Case No.: 24STCV11352

CLASS AND REPRESENTATIVE ACTION

[Hon. Timothy Patrick Dillon, Dept. 15]

**SUPPLEMENTAL DECLARATION OF
KANE MOON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: February 3, 2026

Time: 10:00 a.m.

Dept.: 15

Action Filed: May 6, 2024

Trial Date: Not set

1 **DECLARATION OF KANE MOON**

2 I, KANE MOON, declare as follows:

3 1. I am an attorney at law duly licensed to practice as such before all Courts of the State of
4 California and am one of the attorneys of record for Plaintiffs George Gevork Geysimonyan and Brandon
5 Warren (“Plaintiffs”). I have personal knowledge of the matters set forth herein and could competently
6 testify to the facts described herein.

7 2. This declaration is submitted in response to the Court’s Order issued on February 3, 2026
8 (“Order”) regarding Plaintiff’s Motion for Preliminary Approval of Class Action and PAGA Settlement
9 (“Motion”) which seeks the Court’s approval of the Amended Class Action and Private Attorneys General
10 Act Settlement and Release Agreement, with its Addendum (together, the “Settlement”), entered into
11 between Plaintiffs and Defendant Cellco Partnership (“Defendant”) (together with Plaintiffs, the “Parties”).
12 A true and correct copy of the Addendum is attached hereto as **Exhibit 1**. Plaintiffs’ Counsel have submitted
13 the Addendum to the California Labor and Development Agency (the “LWDA”). A true and correct copy
14 of the confirmation submission email from the LWDA is attached here as **Exhibit 2**. A true and correct copy
15 of the revised Class Notice is attached hereto as **Exhibit 3**. A true and correct copy of the redlined version
16 of the Class Notice showing the changes made is attached hereto as **Exhibit 4**.

17 3. The Court’s concerns raised in the Order are addressed as follows:

- 18 a. The Settlement needs to be revised so that the release is not effective until Defendant
19 fully funds the Gross Settlement Amount. The Settlement has been revised accordingly.
20 (*See Addendum, ¶ 1.*)
- 21 b. The Settlement needs to identify the *cy pres* beneficiary. The Settlement has been
22 revised to reflect the California State Bar Greg E. Knoll Justice Gap Fund as the *cy*
23 *pres* beneficiary. (*See Addendum, ¶ 2.*) This is also reflected in the Class Notice. (*See*
24 *Class Notice, § 3.5, p. 4.*)
- 25 c. The deadline for Class Members to dispute the Settlement should be the same as the
26 deadline for objections and opt-outs. The Settlement has been revised such that the
27 response deadline for disputes, objections, and opt-outs are the same. (*See Addendum,*
28 *¶ 3.*)

- 1 d. The Class Period and PAGA Period end dates need to be defined in the Class Notice.
2 The Class Notice has been revised to reflect the same end dates, June 26, 2025, in the
3 Class Period and PAGA Period as in the Settlement. (*See* Class Notice, p.1.)
4 e. The funding deadline in the Class Notice should be the same as the deadline in the
5 Settlement. The Class Notice has been revised to reflect the same deadline in the
6 Settlement - Defendant shall fund the Gross Settlement not more than 5 days after the
7 Judgment entered by the Court becomes final. (*See* Class Notice, § 3.1, p. 3.)
8 f. Confirm whether there are any conflicts with the *cy pres* beneficiary. There are no
9 conflicts of interest with the California State Bar Greg E. Knoll Justice Gap Fund.

10 I declare under penalty of perjury under the laws of the State of California and the United
11 States that the foregoing is true and correct.

12 Executed on February 11, 2026, at Los Angeles, California.

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Kane Moon
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