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9
10 **SUPERIOR COURT OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 CHRISTIAN SOLIS, RENE A. SORTO,
13 AKILA DAVENPORT, PEARL
PALACIOS, CHRISTIAN FERNANDEZ,
14 and RYAN CROWE, as individuals and on
behalf of all others similarly situated,

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16 Plaintiffs,

17 v.

18 WORLDWIDE FLIGHT SERVICES,
INC., a Delaware corporation; and DOES
19 1-100, inclusive,

20 Defendants.
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Case No.: 22STCV04332

Assigned for All Purposes to:
Hon. Timothy Patrick Dillon
Dept. SSC-15

**SUPPLEMENTAL DECLARATION OF
NIKKI TRENNER IN SUPPORT OF
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

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26 Attorneys for Plaintiff RYAN CROWE
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1 I, NIKKI TRENNER, declare as follows:

2 1. I am an attorney duly licensed to practice in California and before this Court, and I
3 am a partner with Crosner Legal, PC, counsel of record for Plaintiffs Solis, Davenport, and Pearl
4 in the above-captioned matter. If called to testify as to the facts within, I would and could
5 competently do so.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Parties' Revised
7 Class Action and PAGA Settlement Agreement and Class Notice. Attached hereto as **Exhibit 2** is
8 a redline copy of the Agreement showing the changes made from the initial version. Attached
9 hereto as **Exhibit 3** is a true and correct copy of Parties' revised Class Action Notice of
10 Settlement. Attached hereto as **Exhibit 4** is a redline of the Notice reflecting all changes made
11 from the initial version. Attached hereto as **Exhibit 5** is a true and correct copy of the proof of
12 submission of the revised settlement documents to the LWDA.

13 3. Counsel will split any fees awarded by the Court as follows: 70% Crosner Legal;
14 15% Nourmand Law Firm; 15% Mooradian Law; 5% Lavi & Ebrahimian.. All clients have been
15 informed of the proposed fee split and consented thereto in writing.

16 4. Section 5.3 of the Agreement has been revised to reflect the Aggrieved Employees
17 are not releasing any underlying wage and hour claims.

18 5. All individual settlement agreements for the named plaintiffs are being submitted
19 concurrently herewith via Case Anywhere.

20 6. The Agreement (at section 3.2.3) and Notice now reflect a maximum amount for
21 settlement administration costs of \$25,995.00.

22 7. The Class Notice has been revised at Section 3 to state the anticipated funding date
23 for the settlement; at Section 3 to disclose the fee split between counsel; and at Section 3 to
24 reflect the correct not to exceed amount for attorney costs.

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1 8. Filed herewith is the Declaration of Kevin Lee, with Phoenix Settlement
2 Administrators, attesting that Phoenix received the class data from Defendant and confirmed that
3 the escalator clause is not triggered.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed this 1st day of May at Los Angeles, California.

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8 Declarant
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