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Attorneys for Plaintiff ANDREA SOSA,
on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

ANDREA SOSA, on behalf of themselves
herself and others similarly situated,

Plaintiff,

vs.

BANK OF AMERICA NATIONAL
ASSOCIATION.; and DOES 1 to 100,
inclusive,

Defendants.

Case No. 22STCV18958

CLASS ACTION

*[Assigned for all purposes to the Hon. Stuart
Rice, Dept. 1]*

**FURTHER DECLARATION OF
MALCOLM CLAYTON IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

*[Filed pursuant to Court’s tentative ruling
posted on April 11, 2025]*

Hearing Information:

Date: April 16, 2025

Time: 10:30 a.m.

Dept.: 1

Action Filed: June 9, 2022

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1. I am an attorney licensed to practice law in the state of California and have been admitted to practice before this Court. I am an attorney with the law firm Lavi & Ebrahimi, LLP, counsel for Plaintiff ANDREA SOSA (“Plaintiff”) in this action, and I am an attorney assigned to work on this case. Based on my assignment to this case and familiarity with the file and action in this matter, I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto. I am a member in good standing of all State Courts of California.

2. This Declaration is submitted responsive to the Court’s Tentative Ruling posted on April 11, 2025 (the “Tentative Ruling”), it is also in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement.

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claims being released by the settlement prior to April 16, 2024.”

8. The Parties included this language and it remains appropriate because there was one (1) other later filed overlapping PAGA action: *Stephanie Giron v. Bank of America, N.A.*, Superior Court of the State of California – San Diego County Case No. 37-2023-00032504-CU-OE-CTL.

9. Our office is informed that the matter has since been resolved through an individual settlement and dismissed. Our office is not aware of any other actions to which the foregoing phrase would apply.

EXHIBITS

10. A true and correct copy of the executed Amended Stipulation for Settlement and Release of Class and Representative Action Claims (the “Amended Settlement”) is hereto attached as **Exhibit 1.**

11. Attached as **Exhibit B** to the executed Amended Settlement is a true and correct copy of the proposed Class Notice.

12. A true and correct copy of a redline of the Amended Settlement against the Stipulation for Settlement and Release of Class and Representative Action Claims (the “Redlined Amended Settlement”, is hereto attached as **Exhibit 2.**

13. Attached as **Exhibit B** to the Redlined Amended Settlement is a true and correct copy of a redline of the changes made to the proposed Class Notice.

14. A true and correct copy of the confirmation of upload to the LWDA of the Amended Settlement and this declaration is hereto attached as **Exhibit 3.**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16th day of April 2025, at Beverly Hills, California.

/s/ Malcolm Clayton
Malcolm E. Clayton