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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

FELISSIA FRY, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

MERAKEY ALLOS, a Pennsylvania
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No: 37-2022-00032123-CU-OE-CTL

Honorable Loren G. Freestone
Department C-64

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
FATIMA MONTANEZ REGARDING
NOTICE AND SETTLEMENT
ADMINISTRATION**

Date: February 27, 2026
Time: 10:30 AM
Department: C-64

Complaint Filed: August 11, 2022
FAC Filed: October 20, 2022
SAC Filed: September 24, 2024
Trial Date: None Set

1 **SUPPLEMENTAL DECLARATION OF FATIMA MONTANEZ**

2 I, FATIMA MONTANEZ, hereby declare:

3 1. I am employed as a Project Manager by Simpluris, Inc. (“Simpluris”), the claims
4 administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Dr.,
5 Costa Mesa, CA 92626. My telephone number is (407) 205-8487. I am over twenty-one years of age
6 and authorized to make this declaration on behalf of Simpluris and myself.

7 2. Simpluris was approved by Counsel for Felissia Fry (“Plaintiff”), and Merakey Allos
8 (“Defendant”), (collectively the “Parties”), to provide settlement administration services in the *Felissia*
9 *Fry v. Merakey Allos* case (“Settlement”).

10 3. As of this date, there are one thousand one hundred and six (1,106) Settlement Class
11 Members who will be paid their portion of the Net Settlement Amount. Of the one thousand one
12 hundred and seven (1,107) Class Members, nine hundred and eighteen (918) are also PAGA Group
13 Members who will also be paid out of the 25% portion of the PAGA Penalties that is allocated to the
14 PAGA Group.

15 4. On December 16, 2025, Simpluris submitted a declaration advising the Court of its
16 compliance with its administrative duties, as well as other information pertinent to the administration of
17 the Settlement, including the estimated average, minimum, and maximum payments to Class Members,
18 based on a gross settlement amount of \$1,948,750.00.

19 5. The Parties have since agreed to a revised gross settlement amount of \$1,953,000.00,
20 resulting in a Net Settlement Fund of \$1,090,631.23 available for distribution to Settlement Class
21 Members. This amount was calculated by deducting the following from the Gross Settlement Amount:
22 Attorneys’ Fees (\$682,062.50), Attorneys’ Costs (\$14,356.27), Incentive Payment (\$7,500.00), PAGA
23 Penalties (\$112,500.00), Individual PAGA Payments (\$37,500.00), and Settlement Administration
24 Costs (\$8,450.00).

25 6. The revised ***average estimated Individual Settlement Payment*** is \$985.21, the ***highest***
26 ***estimated Individual Settlement Payment*** is \$6,506.64, and the ***lowest estimated Individual Settlement***
27 ***Payment*** is \$25.62.

7. As of this date, there are nine hundred and eighteen (918) PAGA Group Members who will be paid their portion of the 25% portion of the PAGA Penalties that is allocated to the PAGA Group, i.e., \$37,500.00.

8. The *average estimated Individual PAGA Payment* is \$33.88, the *highest estimated Individual PAGA Payment* is \$155.73, and the *lowest estimated Individual PAGA Payment* is \$2.26,

11. These amounts remain unchanged from those stated in the previously submitted declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of February 2026.

[Handwritten signature]

Fatima Montanez