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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

EPIPHANY SEAMAN, JAMIE GANGWER, COURTNEY ROSE, CASSANDRA STEINER, AUDREY TORRES, and SERENA NEGRETE, and on behalf of the State of California, as private attorney generals,

Plaintiffs,

vs.

SAS RETAIL SERVICES, LLC, a Limited Liability Company; and DOES 1 through 50, inclusive,

Defendants.

Case No. 30-2022-01292199-CU-OE-CXC

Assigned for all purposes to the Hon. Melissa R. McCormick, Dept. CX-104

SUPPLEMENTAL DECLARATION OF MADELY NAVA REGARDING PAGA SETTLEMENT PAYMENTS

Hearing Date: November 5, 2026
Hearing Time: 2:00 p.m.
Judge: Hon. Melissa R. McCormick
Dept.: CX105

Action Filed: November 17, 2022
Trial Date: Not Set

I, Madely Nava, declare as follows:

1. I am a Project Manager for Apex Class Action, LLC ("Apex"), the Settlement Administrator in this matter. I have personal knowledge of the facts stated herein and, if called as a witness, could and would competently testify thereto.

2. I submit this Supplemental Declaration to provide the Court with additional information regarding the number of Aggrieved Employees and the estimated Individual PAGA Payments.

3. Defense Counsel confirmed that there are 17,485 Aggrieved Employees and approximately 260,661 eligible pay periods for purposes of calculating the Individual PAGA Payments.

4. The Gross Settlement Amount is $1,560,534.58. The Settlement provides for deductions of $468,160.37 in attorneys' fees, $55,000.00 in litigation costs, $15,000.00 in Class Representative Service Awards, and $53,000.00 in settlement administration costs, resulting in a Net Settlement Amount of $969,374.21.

5. Of the Net Settlement Amount, $727,030.65, representing 75%, is allocated to the California Labor and Workforce Development Agency ("LWDA"), and $242,343.55, representing 25%, is allocated for distribution to the Aggrieved Employees as Individual PAGA Payments.

6. Using the approximately 260,661 PAGA Pay Periods confirmed by Defense Counsel and the $242,343.55 allocated for Individual PAGA Payments, Apex calculated an estimated PAGA Pay Period rate of approximately $0.93 per PAGA Pay Period.

7. Based on the number of PAGA Pay Periods, Aggrieved Employees, and other information confirmed by Defense Counsel, Apex estimates that the lowest Individual PAGA Payment is $0.93, for an Aggrieved Employee with a single PAGA Pay Period; the average Individual PAGA Payment is $13.86; and the highest Individual PAGA Payment is $148.76, for an Aggrieved Employee with 160 PAGA Pay Periods.

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I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this Declaration was executed this 23 day of October 2026, in Irvine, California.

MADELY NAVA