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Attorneys for Plaintiff and all aggrieved employees

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JEREMY LEGARDE, an individual, on
behalf of the State of California, as a private
attorney general,

PLAINTIFF,

v.

SPECTRA360, INC. DBA RASO
SOLUTIONS; and DOES 1 thru 50,
inclusive,

DEFENDANTS.

Case No. 22CV402965

[Case Assigned for All Purposes to Dept. 19]

**SECOND SUPPLEMENTAL
DECLARATION OF LIANE
KATZENSTEIN LY IN SUPPORT OF
MOTION FOR APPROVAL OF
REPRESENTATIVE ACTION
SETTLEMENT**

Complaint Filed: September 12, 2022
Trial Date: None Set

1 **SECOND SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY**

2 I, Liane Katzenstein Ly, declare as follows:

3 1. I am an attorney licensed to practice before all of the courts of the State of California.
4 I am the attorney of record for Plaintiff Jeremy Legarde in the above-entitled action. I have personal
5 knowledge of the facts set forth herein, and if called upon as a witness, I could and would testify
6 competently thereto.

7 2. I graduated from Florida State University in 2005 with a degree in English. I
8 graduated from University of California, Davis School of Law in 2008. I am admitted to practice
9 before the following Courts: United States District Court, Northern, Southern, Eastern, and Central
10 of California; all of California State Courts.

11 3. I have been involved in all of the settlement discussions leading to the present
12 settlement as embodied in the PAGA Settlement Agreement (“Settlement” or “Agreement”). I make
13 this supplemental declaration in support of Plaintiff’s Motion for Approval of Representative Action
14 in the above-captioned case and to address the Court’s concerns addressed on the June 25, 2024
15 Tentative Ruling.

16 **ADDENDUM TO PAGA SETTLEMENT AGREEMENT**

17 4. To address the Court’s concern regarding the end date of the definition of Aggrieved
18 Employees, the Parties have met and conferred and have amended the definition so that is consistent
19 with PAGA Period end date. A true and correct copy of the fully-executed Addendum to the PAGA
20 Settlement Agreement is attached hereto as Exhibit “A.”

21 **PROOF OF SUBMISSION TO THE LABOR AND WORKFORCE DEVELOPMENT**

22 **AGENCY**

23 5. As indicated on the Proof of Service, this supplemental Declaration was uploaded to
24 the Labor and Workforce Development Agency’s (“LWDA”) website on the date this Declaration
25 was filed. Proof of submission of Liane Katzenstein Ly’s Second Supplemental Declaration, all
26 related documents, and copy of the email from the LWDA confirming receipt is attached hereto as
27 Exhibit “B”.

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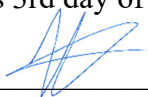
EXHIBITS

6. Attached hereto as Exhibit “A” is a true and correct copy of the fully-executed Addendum to the PAGA Settlement Agreement.

7. Attached hereto as Exhibit “B” is a true and correct copy of the proof of submission of this supplemental filing to the LWDA.

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

This declaration was executed this 3rd day of July, 2024, in Los Angeles, California.



Liane Katzenstein Ly

EXHIBIT "A"

KINGSLEY SZAMET & LY

ERIC B. KINGSLEY, Esq. (SBN 185123)

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San Francisco, CA 94101

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Attorneys for Defendant SPECTRA360, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JEREMY LEGARDE, an individual, on
behalf of the State of California, as a private
attorney general,

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SPECTRA360, INC. DBA RASO
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CASE NO. 22CV402965

[Case Assigned for All Purposes to Dept. 19]

**ADDENDUM TO PAGA SETTLEMENT
AGREEMENT**

Complaint Filed: September 12, 2022

Trial Date: None Set

ADDENDUM TO PAGA SETTLEMENT AGREEMENT

This Addendum to the Parties' PAGA Settlement Agreement ("Addendum") is made and entered into on May 21, 2024, by and between Plaintiff Jeremy Legarde ("Plaintiff") and Defendant Spectra360, Inc DBA Raso Solutions. ("Defendant"). Plaintiff and Defendant are collectively referred to herein as "the Parties". This Addendum amends and modifies that certain PAGA Settlement Agreement dated November 17, 2023 made and entered into by the Parties as follows:

1. Paragraph 1.4 is entirely replaced as follows: "Aggrieved Employees" means all employees who are employed or have been employed as an hourly employee by SPECTRA360, INC. DBA RASO SOLUTIONS, in the State of California who worked one or more pay periods since July 8, 2021 to September 18, 2023. ("aggrieved employees").

2. All other provisions of the PAGA Settlement Agreement remain in full force and effect, other than any provision that conflicts with the terms and spirit of this Addendum, which shall be deemed to be amended appropriately in order to be consistent with this Addendum.

DATED: July 2, 2024

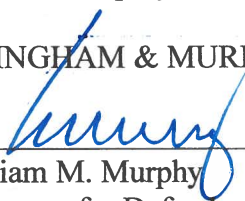
KINGSLEY SZAMET & LY

By: 

Liane Katzenstein Ly
Attorneys for Plaintiff Jeremy Legarde and the
aggrieved employees

DATED: July 2, 2024

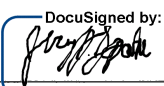
DILINGHAM & MURPHY, LLP

By: 

William M. Murphy
Attorneys for Defendant SPECTRA360, INC. DBA
RASO SOLUTIONS

1
2 DATED: July 2, 2024

JEREMY LEGARDE

3 By: 
4 Jeremy Legarde
5

6 DATED: July 2, 2024

SPECTRA360, INC. DBA RASO SOLUTIONS.

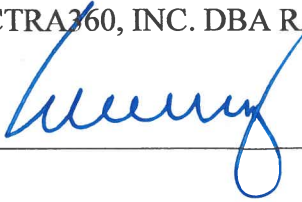
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EXHIBIT "B"

(Proof of Submission to the LWDA)

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On July 3, 2024, I served all interested parties in this action the following documents described as: **SECOND SUPPLEMENTAL DECLARATION OF LIANE KATZENSTEIN LY IN SUPPORT OF MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

DILINGHAM & MURPHY, LLP

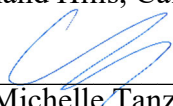
WILLIAM F. MURPHY, Esq.
155 Sansome Street, Suite 700
San Francisco, CA 94101
wfm@dillinghammurphy.com
jjl@dillinghammurphy.com

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July, 2024, at Woodland Hills, California.



Michelle Tanzer