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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

KASTIN DECOMBRE, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

PARKING CONCEPTS, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 25STCV05909

CLASS AND REPRESENTATIVE ACTION

[Assigned for all purposes to the Hon. Elaine Lu,
Dept. 9]

**SUPPLEMENTAL DECLARATION OF
KANE MOON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Hearing Date: September 29, 2026
Time: 10:00 a.m.

Action Filed: March 3, 2025
FAC Filed: May 9, 2025
Trial Date: Not set

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Amended Complaint in the release provisions with references to the operative Second Amended Complaint.

(c) **Corrected Cross-References.**

- 1) In response to the Court's third comment, the Parties corrected the cross-references in the Settlement Agreement. The provision concerning Participating Class Members now correctly references Section 5.2, governing the Released Class Claims, and the provision concerning Non-Participating Class Members who are Aggrieved Employees now correctly references Section 5.3, governing the Released PAGA Claims.

(d) **Plaintiff's Adequacy Declaration.**

- 1) In response to the Court's fourth comment, Plaintiff is concurrently submitting a declaration addressing his willingness and ability to serve as Class Representative and the facts relevant to the Court's determination of his adequacy to represent the Settlement Class.

3. In accordance with the Court's direction, the Parties have prepared a complete First Amended Joint Stipulation of Class and Representative Action Settlement Agreement rather than an addendum. The Parties are submitting a clean, fully executed version of the First Amended Settlement Agreement, together with a redlined version showing the revisions made in response to the Court's tentative ruling. Attached hereto as **Exhibit 1** is a true and correct copy of the fully executed First Amended Joint Stipulation of Class and Representative Action Settlement Agreement. Attached hereto as **Exhibit 2** is a true and correct copy of the redlined First Amended Joint Stipulation of Class and Representative Action Settlement Agreement reflecting the revisions made in response to the Court's tentative ruling.

4. The Parties are likewise submitting clean and redlined versions of the revised Class Notice reflecting the corresponding revisions required by the Court. Attached hereto as **Exhibit 3** is a true and correct copy of the revised Class Notice. Attached hereto as **Exhibit 4** is a true and correct copy of the redlined Class Notice reflecting the revisions made in response to the Court's tentative ruling.

5. The First Amended Settlement Agreement and revised Class Notice were also submitted to the California Labor and Workforce Development Agency (“LWDA”). A true and correct copy of the confirmation email reflecting that submission is attached hereto as **Exhibit 5**.

6. Except for the revisions described above and reflected in the submitted redlines, the material terms of the Parties' Settlement remain unchanged, including the \$550,000.00 Gross Settlement Amount.

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. Executed on September 23, 2026, at Los Angeles, California.

Kane Moon