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20 *Attorneys for Defendant Moz Designs, Inc.*

21 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
22 **COUNTY OF ALAMEDA**

23 JULIS GRAY, an individual, on behalf of
24 himself and all Aggrieved Employees in the
25 State of California;

26 Plaintiff,

27 v.

28 Moz Designs, Inc., a corporation authorized to
do business in California; and DOES 1
THROUGH 50, inclusive,

Defendant.

Case No.: 22CV023297

[Assigned for all purposes to the Hon. Eumi Lee,
Department 512]

**ADDENDUM TO PAGA SETTLEMENT
AGREEMENT**

1 This Addendum to PAGA Settlement Agreement (the "Addendum") has been executed for the
2 purpose of clarifying the terms and conditions of the PAGA Settlement Agreement executed on
3 May 26, 2023 (the "Settlement Agreement") entered into by and among Plaintiff Julis Gray, as an
4 individual and on behalf of all Aggrieved Employees in the State of California ("Plaintiff"), and Defendant
5 Moz Designs, Inc. ("Defendant") (collectively, the "Parties"). This Addendum, as with the Settlement
6 Agreement, is subject to the approval of the Superior Court.

7 WHEREAS, on May 26, 2023, the Parties entered into a PAGA Settlement Agreement
8 ("Agreement");

9 WHEREAS, on May 30, 2023, Plaintiff filed his Motion for Approval of PAGA Action
10 Settlement;

11 WHEREAS, on June 15, 2023, the Court issued a Tentative Ruling indicating that the Court had
12 concerns with the release language;

13 THEREFORE, the Parties hereby add to or modify the Agreement as follows, in the form of a
14 binding Addendum:

15 **PROVISIONS:**

- 16 1. The terms used in this Addendum are defined in the Agreement.
17 2. The Parties agree to replace all of Paragraph 5.1 "Release by PAGA Releasors" with the
18 following:

19 **5.1. Release by PAGA Releasors:**

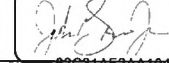
20 All PAGA Releasors are deemed to release, on behalf of themselves and their
21 respective former and present representatives, agents, attorneys, heirs,
22 administrators, successors, and assigns, the Released Parties from any and all
23 claims for PAGA penalties that were alleged, or reasonably could have been
24 alleged, based on the facts and legal claims stated in the PAGA Notices,
25 Complaint and First Amended Complaint, including, but not limited to, claims
26 for PAGA penalties based on violations of Labor Code sections 201, 202, 203,
27 204, 210, 226(a), 226.3, 226.7, 510, 512, 558, 1174, 1174.5, 1194, 1194.2,
28 1197, 1197.1, 1198, 2698, 2699, and 2802, as well as IWC Wage Order Nos.
1-2001 and 4-2001, and Business and Professions Code §§ 17200, *et seq.*

3. All other provisions contained in the Agreement shall remain "as is," and continue in full
force and effect.

1 IT IS SO AGREED.

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3 Dated: June 22, 2023

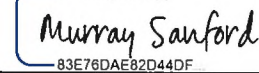
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82C31AF2AA10443
Plaintiff JULIS GRAY

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5
6 Dated: June 23, 2023

DocuSigned by:



83E76DAE82D44DF
Defendant MOZ DESIGNS, INC.

By: _____

Title: _____

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10 Dated: June 22, 2023

GRAHAMHOLLIS APC

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12 By: 

GRAHAM S.P. HOLLIS

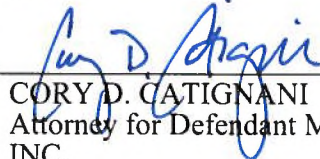
HALI M. ANDERSON

NORA J. STEINHAGEN

Attorneys for Plaintiff JULIS GRAY

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16 Dated: June 23, 2023

VORYS, SATER, SEYMOUR & PEASE,
LLP

17
18 By: 

CORY D. CATIGNANI

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