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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

HAGAI SCHWARTZ, individually, and on behalf
of all others similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act
("PAGA");

Plaintiff,

vs.

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

Defendants.

Case No.: 25CV121174

[Assigned for all purposes to the Honorable
Somnath Raj Chatterjee, Department 21]

**ADDENDUM TO PAGA SETTLEMENT
AGREEMENT**

Complaint Filed: April 30, 2025
Trial Date: None Set

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3.2.2 To PAGA Counsel: A PAGA Counsel Fees Payment of not more than one-third of the Gross Settlement Amount, and PAGA Counsel Litigation Expenses Payment of not more than \$21,519.75. Defendant will not oppose requests for Court approval of these payments provided that they do not exceed these amounts. Plaintiff and/or PAGA Counsel will file a motion for PAGA Counsel Fees Payment and PAGA Litigation Expenses Payment with the motion for approval of the Settlement. If the Court approves a PAGA Counsel Fees Payment and/or a PAGA Counsel Litigation Expenses Payment less than the amounts requested, the Administrator will allocate the remainder to the Net Settlement Amount. Released Parties shall have no liability to PAGA Counsel or any other Plaintiff's Counsel arising from any claim to any portion of any PAGA Counsel Fee Payment and/or PAGA Counsel Litigation Expenses Payment. The Administrator will pay the PAGA Counsel Fees Payment and PAGA Counsel Expenses Payment using one or more IRS 1099 Forms. PAGA Counsel assumes full responsibility and liability for taxes owed on the PAGA Counsel Fees Payment and the PAGA Counsel Litigation Expenses Payment and holds Defendant harmless, and indemnifies Defendant, from any dispute or controversy regarding any division or sharing of any of these Payments.

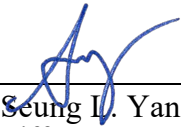
Pursuant to Paragraph 10.9 of the Agreement, the Settlement Agreement may be amended, modified, changed, or waived only by an express written instrument signed by all Parties or their representatives, and approved by the Court. Pursuant to Paragraph 10.9, PAGA Counsel and Counsel for Defendant, as the Parties' Representatives, therefore consent to the above revision as conforming to the intent of the Agreement through their signatures below.

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2 **IT IS SO AGREED.**

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4 **Plaintiff's Counsel as Representative for Plaintiff Hagai Schwartz:**

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6 Dated: 5/4/2026

THE SENTINEL FIRM, APC

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8 By: 

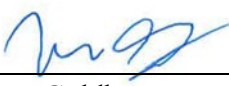
Seung L. Yang
Tiffany Hyun
Jeffrey P. Jackson

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10 Attorneys for Plaintiff
HAGAI SCHWARTZ
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13 **Defendant's Counsel as Representative for Defendant Vagaro, Inc.:**

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15 Dated: 05/04/2026

PERKINS COIE LLP

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17 By: 

18 Matthew Goldberg
19 Brittany Sachs
20 Attorneys for Defendant
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