

AMENDMENT TO PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT
AGREEMENT AND LIMITED RELEASE

The following amendment is made to the Private Attorneys General Act Settlement Agreement and Release (“Agreement”) made by and between Andrew Yusuf Thornburg (“Plaintiff”), as a proxy/agent for the California Labor Workforce Development Agency (“LWDA”), and Defendant PJ Cleveland LLC (“Defendant”), to resolve *Andrew Yusuf Thornburg v. PJ Cleveland LLC dba Papa Johns*, Case No. CVRI2203912, filed on September 13, 2022. These modifications are made in writing and signed by counsel for the parties in accordance with Paragraph 61 of the Agreement.

I. Modifications to Paragraph 17 of the Agreement.

Paragraph 17 of the Agreement originally stated, in whole:

17. “Released Parties” means and refers to Defendant and its former, present, and future owners, parents, shareholders, members, partners, predecessors, successors, assigns, all affiliates and affiliated companies, management companies, joint venturers, subsidiaries, officers, directors, agents (including any investment bankers, consultants, accountants, insurers, reinsurers, attorneys and any past, present or future officers, directors, and employees), employees, and stockholders.

Paragraph 17 of the Agreement is hereby modified to state, in whole:

17. “Released Parties” means and refers to Defendant and its officers, directors, employees, and agents.

II. Modifications to Paragraph 35 of the Agreement.

Paragraph 35 of the Agreement originally stated, in whole:

35. Release by Plaintiff, State of California, and PAGA Employees. Upon the Effective Date, Plaintiff, on behalf of himself, the State of California, and all PAGA Employees, shall fully release and forever discharge Released Parties from the Released Claims during the period from September 13, 2021 through August 11, 2023.

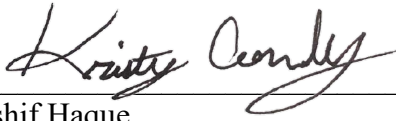
Paragraph 35 of the Agreement is hereby modified to state, in whole:

35. Release by Plaintiff and the State of California. Upon the Effective Date, Plaintiff, on behalf of himself, and the State of California shall fully release and forever discharge Released Parties from the Released Claims during the period from September 13, 2021 through August 11, 2023.

These modifications to the Agreement are hereby agreed to and made by counsel for the parties pursuant to Paragraph 61 of the Agreement.

DATED: 2/22/2024

AEGIS LAW FIRM, PC

By: 
Kashif Haque
Kristy R. Connolly
Attorneys for Andrew Yusuf Thornburg

DATED: 2/21/2024

O'HAGAN MEYER LLP

By: 
Soojin Kang
Joseph Ramli
Attorneys for PJ Cleveland LLC