

Kane Moon (SBN 249834)
Allen Feghali (SBN 301080)
H. Scott Leviant (SBN 200834)
Sandy Pham (SBN 352753)
MOON LAW GROUP, PC
725 S. Figueroa St., 31st Floor
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125
E-mail: kmoon@moonlawgroup.com
E-mail: afeghali@moonlawgroup.com
E-mail: hsleviant@moonlawgroup.com
E-mail: spham@moonlawgroup.com

Attorneys for Plaintiff Jorge Sandoval

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

JORGE SANDOVAL, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

VALLEY PLATING WORKS, INC., a
California corporation; and DOES 1 through
10, inclusive,

Defendant.

Case No.: 25STCV15514

REPRESENTATIVE ACTION

[Assigned to the Hon. Bruce Iwasaki, Dept 11]

**SUPPLEMENTAL DECLARATION OF KANE
MOON IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Action filed: May 27, 2025
Trial date: Not set

I, KANE MOON, declare as follows:

2. This declaration is submitted in support of Plaintiff's Motion for Approval of PAGA Settlement.

4. Pursuant to the Court’s order, the Parties have revised the Released Parties definition to align with the Los Angeles Superior Court PAGA Model Agreement and have entered into the First Amended PAGA Settlement Agreement (the “Settlement”). A true and correct copy of the fully executed Settlement is attached hereto as **Exhibit 1**. A true and correct copy of the redlined version of the Settlement showing the changes made to the Released Parties definition is attached hereto as **Exhibit 2**.

6. A revised Proposed Order reflecting the Settlement is filed concurrently herewith. A true and correct copy of the redlined Proposed Order is attached hereto as **Exhibit 4**.

Kane Moon