

**AMENDMENT TO SETTLEMENT AGREEMENT AND RELEASE OF PAGA
CLAIMS**

On or about May 28, 2024, Plaintiff Ralph Shakespeare, individually and in his capacity as representative of the State of California on behalf of other aggrieved employees (“Plaintiffs”), and Defendant Iron Wall Security, Inc. (“Defendant”) (collectively, the “Parties”) entered into a Settlement Agreement and Release of PAGA Claims (“Settlement Agreement”) to resolve action *Ralph Shakespeare, et al. v. Iron Wall Security, Inc., et al.*; Case No. 37-2023-00006539-CU-OE-CTL, pending in San Diego County Superior Court.

Counsel for Plaintiffs and Defendant, through counsel of record who are authorized by the parties to amend the Settlement Agreement, agree to the following amendment to the Settlement Agreement:

1. The “Total Settlement Payment” shall be defined as an amount not to exceed Ninety-Five Thousand Dollars and Zero Cents (\$95,000.00), in paragraph 16 of the Settlement Agreement.
2. Defendant shall pay a Total Settlement Payment in a total amount of Ninety-Five Thousand Dollars and Zero Cents (\$95,000.00).
3. Defendants shall provide the Total Settlement Payment to the Settlement Administrator:
(a) within thirty (30) days of the Effective Date or (b) by no later than January 1, 2025, whichever is later.
4. Plaintiff’s counsel shall remain entitled to move the Court for an award of attorneys’ fees in the amount of \$33,333.33, which represents approximately 35% of the Total Settlement Payment.

Dated: July 16, 2024

Ferraro Vega Employment Lawyers, Inc.



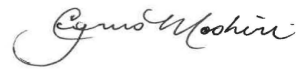
Nicholas J. Ferraro, Esq.

Lauren N. Vega, Esq.

Attorneys for Plaintiff Ralph Shakespeare

Dated: July 16, 2024

Fisher & Phillips LLP

A handwritten signature in cursive script, appearing to read "Cyrus Moshiri".

Boris Sorsher, Esq. _____

Cyrus Moshiri, Esq.

Attorneys for Defendant Iron Wall Security, Inc.