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

MIGUEL A. FLORES, individually, and on behalf of  
all others similarly situated,

Plaintiff,

vs.

CONTINENTAL FORGE COMPANY, LLC, a  
limited liability company; and DOES 1 through 10,  
inclusive,

Defendants

Case No.: 23STCV07200

CLASS AND REPRESENTATIVE ACTION

*[Assigned to Hon. Theresa M. Traber, Dept. I]*

**SUPPLEMENTAL DECLARATION OF  
KANE MOON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

*[Filed with [Proposed] Preliminary Approval  
Order]*

Action Filed: April 3, 2023

Trial Date: Not set

1 **SUPPLEMENTAL DECLARATION OF KANE MOON**

2 I, KANE MOON, declare as follows:

3 1. I am an attorney at law duly licensed to practice as such before all Courts of the State of  
4 California and am one of the attorneys of record for Plaintiff Miguel A. Flores ("Plaintiff") and the putative  
5 Class. I have personal knowledge of the matters set forth herein and could competently testify to the facts  
6 described herein.

7 2. On March 11, 2026, the Court issued a Minute Order regarding the calculation of attorney's fees  
8 and ordered the parties to provide the Court with supplemental papers describing what solution they wish to  
9 propose to the Court.

10 3. In response to the Court's directive, Plaintiff and Defendant Continental Forge Company, LLL  
11 ("Defendant") (together with Plaintiff, the "Parties") have entered into the Second Amended Class Action  
12 and PAGA Settlement Agreement (the "Settlement") to revise the attorney's fees to 33 1/3% of the  
13 Uncredited Settlement Amount.

14 4. A true and correct copy of the Settlement is attached hereto as **Exhibit 1**. A true and correct copy  
15 of the redlined version of the Settlement showing the changes made is attached hereto as **Exhibit 2**. The  
16 Parties also updated the Class Notice to reflect the changes in the Settlement. A true and correct copy of the  
17 Class Notice is attached to the Settlement as Exhibit A. A true and correct copy of the redlined version of the  
18 Class Notice showing the changes made is attached hereto as **Exhibit 3**. Plaintiff's Counsel submitted the  
19 Settlement to the California Labor and Workforce Development Agency (the "LWDA"). A true a correct  
20 copy of the email confirmation from the LWDA is attached hereto as **Exhibit 4**. A revised Proposed Order  
21 reflecting the changes to the Settlement is being filed concurrently with this instant declaration. A true and  
22 correct copy of the redlined Proposed Order showing the changes made is attached hereto as **Exhibit 5**.

23 I declare under penalty of perjury under the laws of the State of California and the United States that  
24 the foregoing is true and correct.

25 Executed on March 30, 2026, at Los Angeles, California.

26  
27   
28 Kane Moon