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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

EMMANUEL CALDERA, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiffs,

vs.

ZEB'S WORLD FAMOUS BOATHOUSE INC.
DBA GOAT HILL TAVERN, a California
corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No.: 30-2023-01310801-CU-OE-CXC

Honorable Randall J. Sherman
Department CX105

**SUPPLEMENTAL DECLARATION OF
MADELY NAVA OF APEX CLASS ACTION,
LLC, REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

Date: April 25, 2025
Time: 10:00 a.m.
Dept.: CX105

Complaint Filed: March 7, 2025
FAC Filed: May 12, 2023
Trial Date: Not Set

1 I, Madely Nava, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a Case Manager
3 for Apex Class Action, LLC, (hereinafter referred to as "Apex"), the professional settlement services
4 provider who has been retained by the Parties' Counsel and subsequently appointed by the Court to
5 serve as the Settlement Administrator for the above captioned *Caldera v. Zeb's World Famous*
6 *Boathouse Inc. dba Goat Hill Tavern* matter. On behalf of both Apex and myself, I possess the
7 authority to issue this declaration. I am personally acquainted with the information contained herein, and
8 in the event of being summoned to provide testimony, I am fully capable and willing to provide
9 competent testimony regarding these facts.

10 2. The Response Deadline for Requests for Exclusion, Notices of Objection, and Workweeks
11 Disputes was April 4, 2025. The extended Response Deadline for Requests for Exclusion, Notices of
12 Objection, and Workweeks Disputes was April 19, 2025.

13 3. As of my previous declaration filed on April 3, 2025, there have been no Requests for Exclusion,
14 Notices of Objection, or Workweeks Disputes.

15 4. Accordingly, with the 1 previous Request for Exclusion from Corey Burke, Apex reports a total
16 of 131 Settlement Class Members, constituting 99% of the total Class, who worked 2,825 Workweeks.

17 I declare under penalty of perjury under the laws of the State of California and the United States
18 that the foregoing is true and correct, and that this Declaration was executed this 21st day of April 2025,
19 in Irvine, California.

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MADELY NAVA

1 **PROOF OF SERVICE**

2 I, Stephany Sinaguinan, certify and declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business address is
4 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On April 21, 2025, I served a copy
of the following document:

5 **SUPPLEMENTAL DECLARATION OF MADELY NAVA OF APEX CLASS**
6 **ACTION, LLC, REGARDING NOTICE AND SETTLEMENT ADMINISTRATION**

on the interested parties as follows:

7 Maryam Shokrai (maryam@claruspc.com)
8 Niosha Shakoori (niosha@claruspc.com)
9 **CLARUS PROFESSIONAL CORPORATION**
3419 Via Lido, No. 487
10 Newport Beach, California 92663
11 Tel: (949) 233-3151

12 *Attorneys for Defendant Zeb's World Famous Boathouse, Inc. dba Goat Hill Tavern*

13 ☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered
electronically to the above referenced address via email from email address
14 *ssina@blackstonepc.com* pursuant to California Code of Civil Procedure section 1010.6(e)(1).
I did not receive any electronic message or other indication that the transmission was
15 unsuccessful.

16 State of California, Labor & Workforce Development Agency

Web URL:

17 <http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

18 ☒ **BY ONLINE SUBMISSION:** The foregoing document was transmitted to the California
Labor and Workforce Development Agency through the online system established for the
19 submission of notices and documents, in conformity with California Labor Code section
2699(l). I did not receive any electronic message or other indication that the transmission was
20 unsuccessful.

21 ☒ **STATE** – I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

22
23 Executed on April 21, 2025 at Beverly Hills, California.

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25 Stephany Sinaguinan