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Attorneys for Plaintiff

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

SANTIAGO ALEJANDRE, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

DHB DELIVERY LLC, a California limited
liability company; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 22STCV10802

Assigned for All Purposes to:
Honorable Carolyn B. Kuhl
Department 12

CLASS ACTION

**PLAINTIFF'S SUPPLEMENTAL BRIEF
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Supplemental Declaration of Proposed Class
Counsel (Douglas Han); Declaration of
Defense Counsel (Tim L. Johnson); and
[Proposed] Order filed concurrently herewith]

Hearing Date: November 1, 2023
Hearing Time: 11:30 a.m.
Hearing Place: Department 12

Complaint Filed: March 29, 2022
FAC Filed: March 16, 2023
Trial Date: None Set

Plaintiff Santiago Alejandro (“Plaintiff”) provides this supplemental submission in response to the Court’s ruling on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on October 4, 2023. At the originally scheduled Preliminary Approval Hearing, the Court requested the Parties address concerns regarding the settlement. After Plaintiff and Defendant DHB Delivery LLC (“Defendant”) (collectively, known as “Parties”) made their oral arguments, the Court continued the Preliminary Approval Hearing to November 1, 2023 to give the Parties sufficient time to gather the necessary documents and to brief the necessary arguments to address the Court’s concerns set forth at the hearing.

The chart below lists each of the Court’s concerns and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) The Court ordered the Parties to bring forth the financial documents and tax returned provided by Defendant prior to and during mediation that the Parties relied upon when drafting the settlement terms.	(Supplemental Declaration of Douglas Han in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 4; Exhibit 2.)
(2) The Court ordered the Parties to address Plaintiff’s adequacy to serve as a class representative despite having signed an arbitration agreement.	(Supp. Han Decl., <i>supra</i> , at ¶¶ 5-7.)
(3) The Court ordered the Parties to explain why Amazon should be included as a released party.	The Amended Settlement Agreement has been modified to remove Amazon from the Released Parties definition. (Supp. Han Decl., <i>supra</i> , at ¶ 10, Exhibit 3, § A(42); Declaration of Tim. L. Johnson (“Johnson Decl.”), ¶¶ 3-5,

Exhibit A.)

The Class Notice has been modified to remove Amazon from the Released Parties definition. (Supp. Han Decl., *supra*, at ¶ 12, Exhibit 5, § 3(12); Johnson Decl., *supra*, at ¶¶ 3-5, Exhibit A.)

Dated: October 20, 2023

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

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On October 20, 2023, I served the foregoing document described as

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

for the following case:	Alejandro v. DHB Delivery LLC
LWDA/Court Case No.:	LWDA-CM-939493-23
	Case No. 22STCV10802
	Los Angeles County Superior Court

on interested parties in this action by electronically submitting as follows:

**State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814**

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 20, 2023, at Pasadena, California.

Shushi

Sophia Hanneyan