

DOUGLAS HAN (SBN 232858)  
SHUNT TATAVOS-GHARAJEH (SBN 272164)  
HAIG HOGDANIAN (SBN 334699)  
**JUSTICE LAW CORPORATION**  
751 N. Fair Oaks Avenue, Suite 101  
Pasadena, California 91103  
Telephone: (818) 230-7502  
Facsimile: (818) 230-7259

*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); Notice of  
Lodging Records Under Seal 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.

| <b>Ruling</b>                                                                                                                                                                                                  | <b>Revisions/Submissions</b>                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (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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## PROOF OF SERVICE