

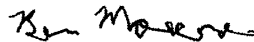
## PAGA SETTLEMENT ADDENDUM

This Addendum is made to the PAGA Settlement Agreement executed by Defendants Defendant Pacific Reproductive Medical Center, Inc. and Rifaat Salem on April 11, 2025 and by Plaintiff Benjamin Moreno in April 2025. The Addendum modifies the original PAGA Settlement Agreement at paragraph 1.16 as follows:

1.16. "PAGA Counsel" means Matthew Gutierrez, Esq., LAWYERS FOR LEGAL RIGHTS LLP, and Jessica Campbell, Esq., of AEGIS LAW FIRM Law Firm who have entered into a Joint Prosecution Agreement as to the overlapping PAGA claims of Plaintiff in this pending lawsuit and *Tracy Shade v. Pacific Reproductive Medical Center, Inc., et al.* pending in the Los Angeles Superior Court (LASC Case No. 22STCV41033).

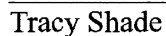
3.2.1. To PAGA Counsel: A PAGA Counsel Fees Payment of not more than 33% which is currently estimated to be \$33,000.00 and PAGA Counsel Litigation Expenses Payment of not more than \$20,000.00. Defendants will not oppose requests for Court approval of these payments provided that they do not exceed these amounts. Plaintiff and/or PAGA Counsel will file an application or motion for PAGA Counsel Fees Payment and PAGA Litigation Expenses Payment. If the Court approves a PAGA Counsel Fees Payment and/or a PAGA Counsel Litigation Expenses Payment less than the amounts requested, the Administrator will allocate the remainder to the Net Settlement Amount. Released Parties shall have no liability to PAGA Counsel or any other Plaintiff's Counsel arising from any claim to any portion any PAGA Counsel Fee Payment and/or PAGA Counsel Litigation Expenses Payment. The Administrator will pay the PAGA Counsel Fees Payment and PAGA Counsel Expenses Payment using one or more IRS 1099 Forms. PAGA Counsel assumes full responsibility and liability for taxes owed on the PAGA Counsel Fees Payment and the PAGA Counsel Litigation Expenses Payment and holds Defendants harmless, and indemnifies Defendants, from any dispute or controversy regarding any division or sharing of any of these Payments.

Dated: 04 / 22 / 2025



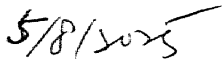
Benjamin Moreno

Dated:



Tracy Shade

Dated:



Rifaat Salem for himself and Pacific Reproductive Medical Center, Inc.

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Dated:

\_\_\_\_\_  
Benjamin Moreno

Dated: 05/06/25

Tracy Shade  
Tracy Shade (May 6, 2025 17:47 PDT)  
\_\_\_\_\_  
Tracy Shade

Dated:

\_\_\_\_\_  
Rifaat Salem for himself and Pacific Reproductive Medical Center, Inc.