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Attorneys for Plaintiff

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

DANIELLE CHEVERTON, individually, and
on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

STITCH & FEATHER, INC., a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 30-2022-01260526-CU-OE-CXC

Assigned for All Purposes to:
Honorable Randall J. Sherman
Department CX-105

CLASS ACTION

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

[Reservation ID: 74041642]

RELATED TO ROA NO. 57

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); Declaration
of Matthew Pate; Declaration of Candi
Anderson; and Amended [Proposed] Order
filed concurrently herewith]

Hearing Date: September 28, 2023
Hearing Time: 10:00 a.m.
Hearing Place: Department CX-105

Complaint Filed: May 17, 2022
FAC Filed: May 5, 2023
Trial Date: None Set

Plaintiff Danielle Cheverton (“Plaintiff”) provides this supplemental submission in response to the Court’s tentative ruling on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement scheduled for hearing on September 8, 2023. On September 7, 2023, prior to the scheduled Preliminary Approval Hearing, the Court issued a tentative ruling ordering Plaintiff and Stitch & Feather, Inc. (“Defendant”) to address certain concerns and to modify the language in the Notice of Class Action Settlement (“Class Notice”) and Request for Exclusion Form (“Exclusion Form”).

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

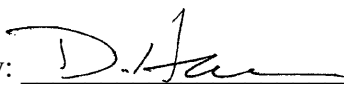
Ruling	Revisions/Submissions
(1) Even though § 4 of the settlement agreement says that the parties and their counsel execute this agreement, the settlement agreement was not approved as to form by defendant’s counsel.	(Supplemental Declaration of Douglas Han in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 5; Declaration of Matthew Pate, ¶ 2.)
(2) The Request for Exclusion Form says, “EVEN IF I ELECT TO OPT OUT, I CANNOT PURSUE ANY ACTION UNDER PAGA AGAINST THE RELEASED PARTIES FOR ANY CLAIMS THAT AROSE FROM APRIL 12, 2022 THROUGH JUNE 2, 2023.” However, only the PAGA Released Claims as defined in §I.DD of the settlement agreement are being released by virtue of this settlement. The last sentence of the class notice on p. 4, under “Opt Out”, has a similar problem.	The Class Notice has been modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 6; Exhibit 3, § 6.) The Exclusion Form has been modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 7; Exhibit 4, p. 1.)

(3) There is no information as to how many of the class members or aggrieved employees speak and/or read English, which might require that the class notice also be in another language.

(Supp Han Decl., *supra*, at ¶ 8; Declaration of Candi Anderson, ¶ 2.)

Dated: September 14, 2023

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

**PROOF OF SERVICE
1013A(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Avenue, Suite 101, Pasadena, CA 91103 and my electronic service address is mluna@justicelawcorp.com

On September 18, 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:	Cheverton v. Stitch & Feather, Inc.
LWDA/Court Case No.:	LWDA Case No.: CM- 948169-23
	Court Case No.: 30-2022-01260526-CU-OE-CXC
	Orange 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 September 18, 2023, at Pasadena, California.

Madison Luna