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12 *Attorneys for Plaintiff*

13 **SUPERIOR COURT OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 CHETERRA YOUNG, an Individual, on
16 behalf of herself and all others similarly
situated,

17 Plaintiff,

18 v.

19 PFT ALEXANDER, INC., a California
20 corporation; and DOES 1 through 10,
inclusive,

21 Defendant.
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Electronically FILED by
Superior Court of California,
County of Los Angeles
8/29/2024 4:06 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Nunez, Deputy Clerk

Case No.: 23STCV07449

CLASS AND REPRESENTATIVE ACTION

Assigned For All Purposes To:
Hon. Kenneth R. Freeman

**DECLARATION OF SERVICE UPON
INTERESTED PARTIES AND THE
LABOR AND WORKFORCE
DEVELOPMENT AGENCY**

Date: March 27, 2025
Time: 10:00 a.m.
Dept.: 14

Complaint filed: April 5, 2023
Trial Date: None Set

1 I, Matthew Atlas, declare as follows:

2 I am employed in the County of San Diego, State of California. I am over the age of 18 and
3 not a party to this action. My business address is 605 "C" Street, Suite 200, San Diego, California
4 92101-5305. On August 29, 2024, I instituted service of the following document(s):

5 **[1] NOTICE OF MOTION AND PLAINTIFF'S UNOPPOSED MOTION FOR**
6 **PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION**
7 **SETTLEMENT**

8 **[2] MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF**
9 **PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF**
10 **CLASS AND REPRESENTATIVE ACTION SETTLEMENT**

11 **[3] DECLARATION OF MICHAEL D. SINGER IN SUPPORT OF PLAINTIFF'S**
12 **UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND**
13 **REPRESENTATIVE ACTION SETTLEMENT**

14 **[4] DECLARATION OF MAGGIE REALIN IN SUPPORT OF PLAINTIFF'S**
15 **UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND**
16 **REPRESENTATIVE ACTION SETTLEMENT**

17 **[5] DECLARATION OF DAVID R. MARKHAM IN SUPPORT OF PLAINTIFF'S**
18 **MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE**
19 **ACTION SETTLEMENT**

20 **[6] DECLARATION OF CHETERRA YOUNG IN SUPPORT OF PLAINTIFF'S**
21 **UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND**
22 **REPRESENTATIVE ACTION SETTLEMENT**

23 **[7] DECLARATION OF MICHAEL MOORE ON BEHALF OF PHOENIX CLASS**
24 **ACTION SETTLEMENT ADMINISTRATION IN SUPPORT OF PRELIMINARY**
25 **APPROVAL**

26 **[8] [PROPOSED] ORDER GRANTING PLAINTIFF'S UNOPPOSED MOTION FOR**
27 **PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION**
28 **SETTLEMENT**

on the following interested parties in this action by transmitting such document(s) electronically via
CASE ANYWHERE, pursuant to the Court's order dated July 21, 2023:

Counsel for Defendant

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SERVICE UPON LABOR AND WORKFORCE DEVELOPMENT AGENCY (“LWDA”)

On August 29, 2024, the aforementioned document(s) have been provided to the LWDA by transmitting such document(s) electronically through the LWDA's website, using the appropriate intake form. See Exhibit B to the Declaration of Michael D. Singer filed concurrently with this motion.

[XX] **STATE:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed August 29, 2024, at San Diego, California.


Matthew Atlas