

TOREY JOSEPH FAVAROTE (SBN: 198521)  
DAVID H. DANNING (SBN: 354477)  
GLEASON & FAVAROTE LLP  
3646 Long Beach Blvd., Suite 203  
Long Beach, California 90807  
Telephone: (213) 452-0510  
Facsimile: (213) 452-0514  
[tfavarote@gleasonfavarote.com](mailto:tfavarote@gleasonfavarote.com)  
[ddanning@gleasonfavarote.com](mailto:ddanning@gleasonfavarote.com)

Attorneys for Plaintiff Maria Reyes on behalf  
of all aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO**

MARIA REYES, on behalf of all aggrieved  
employees,

Plaintiff,

vs.

LYNEER STAFFING SOLUTIONS, LLC, a  
Delaware Limited Liability Corporation; and  
DOES 1-40, inclusive,

Defendants.

) Case No. CIVSB2317672  
)  
)

**PLAINTIFF'S SUPPLEMENTAL  
REPORT IN ADVANCE OF OSC RE:  
STATUS OF MOTION FOR APPROVAL**

) Date: July 14, 2026  
) Time: 8:30 a.m.  
) Judge: Hon. Stephanie Tanada  
) Dept.: S33  
)

) Action Filed: August 1, 2023  
) Trial Date: October 20, 2025  
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1 Plaintiff Maria Reyes ("Plaintiff") submits this report in advance of the hearing on the  
2 Court's OSC Re: Status of Motion for Approval set for July 14, 2026 at 8:30 a.m.

3 After submitting the last report on June 18, 2026, the conference set for June 25, 2026 was  
4 continued so that the parties could finalize a final proposed order for the Court to sign. Declaration  
5 of David Danning "Danning Decl." Exhibit A. Plaintiff has received redlines from Defendant and  
6 accepted all of those redlines. Danning Decl. Exh. B. Plaintiff also provided Defendant with the  
7 opportunity to make any additional changes. Id.

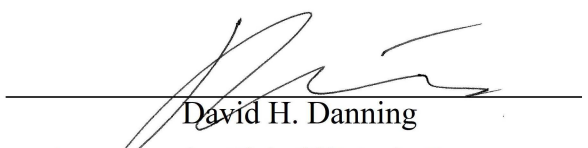
8 Plaintiff requests that the Court sign the attached proposed order to avoid any further delay.  
9 A redline showing the changes from the proposed order and judgment submitted prior and the  
10 present proposed order and judgment submitted to the Court with this report is attached to the  
11 Danning Decl. as Exhibit C.

12 After confirming the approximately 6,120 PAGA members covered by the settlement,  
13 Plaintiff reached out to the settlement administrator for an updated bid which is attached to the  
14 Danning Decl. as Exhibit D. Plaintiff requests the settlement administration costs in the judgment  
15 be modified from \$12,990 to \$23,990 to compensate the administrator for the increased costs for  
16 administering the settlement due to the increase in covered individuals. This will only result in the  
17 payment to the LWDA to be reduced from \$407,820.00 to \$399,637.50 (a difference of \$8,182.50),  
18 and would only reduce the payment per pay period to the aggrieved employees by \$0.03.

19 Plaintiff's counsel has provided a copy of these papers to the LWDA, along with a copy of  
20 the Court's order noticing the updated date and time of the OSC, and the new proposed judgment.  
21 Those papers have been submitted to the LWDA immediately before filing the present papers with  
22 the Court. Plaintiff's counsel is filing a proof of service for that submission to the LWDA  
23 concurrently with the present papers.

24 Dated: July 2, 2026

GLEASON & FAVAROTE LLP  
TOREY JOSEPH FAVAROTE  
DAVID H. DANNING

26  
27   
David H. Danning

Attorneys for Plaintiff Maria Reyes on  
behalf of all aggrieved employees

**PROOF OF SERVICE**

I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 3646 Long Beach Blvd., Suite 203, Long Beach, CA 90807.

On July 2, 2026, I served a copy(ies) of the following document(s):

**PLAINTIFF'S SUPPLEMENTAL REPORT IN ADVANCE OF OSC RE: STATUS OF MOTION FOR APPROVAL**

on the parties to this action as follows:

| Attorney                                                                                                                                                                                                                                                                                                                                           | Party(ies) Served                 | Method of Service |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-------------------|
| Stacey M. Cooper, Esq.<br>STACEY COOPER LAW, PC<br>888 Prospect Street, Suite 200<br>La Jolla, CA 92037<br>Phone: 619-673-5022<br><a href="mailto:stacey@cooperlawpc.com">stacey@cooperlawpc.com</a><br><a href="mailto:corbyns@cooperlawpc.com">corbyns@cooperlawpc.com</a><br><a href="mailto:sandra@cooperlawpc.com">sandra@cooperlawpc.com</a> | Lyneer Staffing<br>Solutions, LLC | One Legal, LLC    |

- ☐ [BY OVERNIGHT COURIER] I caused the sealed envelope(s) to be delivered by a commercial courier service for overnight delivery to the offices of the addressee(s).
- ☐ [BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Ace Attorney Service, Inc. this date.
- ☒ [BY DESIGNATED ELECTRONIC FILING SERVICE] I hereby certify that the above-referenced document(s) were served electronically on the parties listed herein at their most recent known email address or email of record by submitting an electronic version of the document(s) to One Legal, LLC, through the user interface at [www.onelegal.com](http://www.onelegal.com).

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on July 2, 2026, at Long Beach, California.

  
\_\_\_\_\_  
Thomas Steinhart