

AMENDMENT TO CLASS ACTION SETTLEMENT AGREEMENT

On or about November 13, 2023, Plaintiff Manuel Fernandez, individually and on behalf of all others similarly situated (“Plaintiffs”), and Defendants VLS Environmental Solutions, LLC and VLS San Diego, LLC (“Defendants”) (collectively, the “Parties”) entered into a Class Action Settlement Agreement (“Settlement Agreement”) to resolve action *Manuel Fernandez et al. v. VLS Environmental Solutions, LLC et al.*; Case No. 37-2023-00021038-CU-OE-CTL, pending in San Diego County Superior Court.

On or about March 15, 2024, the Parties became aware that paragraph 1.30 of the Settlement Agreement erroneously defines the “PAGA Period” as May 9, 2020, through December 31, 2023. However, the PAGA notice was submitted to the California Labor and Workforce Development Agency on May 9, 2023. Therefore, the PAGA Period begins May 9, 2022, not May 9, 2020 as defined in the Settlement Agreement.

Counsel for Plaintiffs and Defendants agree to the following amendment to the Settlement Agreement:

1. The “PAGA Period” shall be defined as May 9, 2022, through December 31, 2023, in paragraph 1.30 of the Settlement Agreement.

Dated: March 27, 2024

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Dated: March 27, 2024

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