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10 DAVID FREDERICK BITONTI, JR.,
11 MERRIT LYNN CHASSIE, and the Proposed Class

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

14 DAVID FREDERICK BITONTI JR. and
15 MERRIT LYNN CHASSIE, individually,
16 and on behalf of others similarly situated,
17 and on behalf of other aggrieved employees
18 pursuant to the Private Attorneys General
19 Act,

20 Plaintiffs,

21 vs.

22 TEEN ROAD TO SAFETY INC., a
23 California corporation; ANDREW
24 WUNDERLICH, an individual; and DOES
25 1 through 50, inclusive,

26 Defendants.

Case No. 30-2023-01333703-CU-OE-CXC

**SUPPLEMENTAL DECLARATION OF
MERRIT LYNN CHASSIE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: September 4, 2025
Time: 2:00 p.m.
Dept.: CX104

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1. I am over the age of 18 years old and a resident of the United States. I have personal knowledge of the matters set forth herein, and if called upon to testify, I could and would do so competently. I make this supplemental declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I have spent between 20-25 hours on this case, which includes having discussions with my attorneys to discuss my experience working for Defendant, reviewing the Complaint that was filed in this matter, assisting my attorneys with preparing for mediation, and reviewing the settlement agreement that I ultimately signed.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on August 21, 2025, in Orange County, California.

Merrit Chassie
Merrit Lynn Chassie

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(merritrealtor@gmail.com) from brenda@dombrauchwerger.com
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Viewed by Merrit Lynn Chassie (merritrealtor@gmail.com)
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The document has been completed.