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Attorneys for Plaintiffs

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

GIANNA GRAZIANO, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

SYNERGY SHIPPING LLC, a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 56-2022-00568488-CU-OE-VTA

Assigned for All Purposes to:
Honorable Ronda J. McKaig
Department 41

CLASS ACTION

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

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); Declarations
of Proposed Class Representatives (Gianna
Graziano and Ethan Burch); Declaration of
Lisa Mullins; and Amended [Proposed]
Order filed concurrently herewith]

Hearing Date: March 29, 2024
Hearing Time: 8:20 a.m.
Hearing Place: Department 41

Complaint Filed: July 27, 2022
FAC Filed: June 27, 2023
Trial Date: None Set

Plaintiffs Gianna Graziano and Ethan Burch (“Plaintiffs”) provide this supplemental submission in response to the Court’s tentative ruling on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. On March 5, 2024, prior to the originally scheduled Preliminary Approval Hearing, the Court issued a tentative ruling ordering Plaintiffs and Defendant Synergy Shipping LLC (“Defendant”) to file additional information and continuing the Preliminary Approval Hearing to March 29, 2024 at 8:20 a.m.

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

Ruling	Revisions/Submissions
(1) A counsel declaration that provides information about the firm’s hourly billing rate and the hours spent by the attorneys to provide preliminary information for a lodestar cross-check.	(Supplemental Declaration of Douglas Han in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶¶ 5-7; Exhibits 3, 4.)
(2) A counsel declaration that provides the basis for the estimated litigation costs of approximately \$20,000.	(Supp Han Decl., <i>supra</i> , at ¶ 8; Exhibit 5.)
(3) Declarations that provide support for the requested \$5,000 Class Representative Service Payments.	(Supp Han Decl., <i>supra</i> , at ¶ 9; See Declaration of Gianna Graziano; See Declaration of Ethan Burch.)
(4) A declaration from a representative of Proposed Administrator ILYM Group, Inc. stating the basis for (a) why it should be approved at Administrator in this case and (b) the administration expense payments of \$10,000.	(Supp Han Decl., <i>supra</i> , at ¶ 10; See Declaration of Lisa Mullins.)

1 Dated: March 22, 2024

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3 By: 
4 Douglas Han
5 *Attorney for Plaintiffs*
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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 manderson@justicelawcorp.com

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

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

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.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 22, 2024, at Pasadena, California.

Maithe Andrews

Mariah Anderson