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Attorneys for Plaintiff

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

ANALLELI DELEON, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

CLINICA DE SALUD DEL VALLE DE
SALINAS, a California nonprofit corporation;
and DOES 1 through 100, inclusive;

Defendants.

Case No.: 23CV002600

Assigned for All Purposes to:
Honorable Vanessa W. Vallarta
Department 13A

CLASS ACTION

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

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han) filed
concurrently herewith]

Hearing Date: December 6, 2024
Hearing Time: 8:30 a.m.
Hearing Place: Department 13A

Complaint Filed: August 10, 2023
FAC Filed: October 2, 2024
Trial Date: None Set

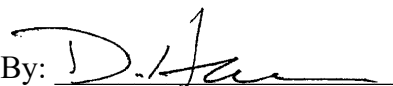
Plaintiff Analleli Deleon (“Plaintiff”) provide this supplemental submission in response to the Court’s tentative ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on December 6, 2024 at 8:30 a.m. On December 5, 2024, the Court issued a tentative ruling granting the Motion for Preliminary Approval that is conditioned on modifying the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval (“Class Notice”). At the Preliminary Approval Hearing, the Court agreed to grant the Motion for Preliminary Approval conditioned on the Parties filing supplemental documents evidencing the modifications made to the Class Notice.

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

Ruling	Revisions/Submissions
(1) Amendment of the Class Notice to include Defendant’s right to withdraw from the settlement if more than 20% of Class Members opt out.	The Class Notice has been modified accordingly. (Supplemental Declaration of Douglas Han in Support of Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 3; Exhibit 3, § III(12).)
(2) Amendment of the Class Notice to alert Class Members to the 14-day extension to opt out, object, or submit workweek disputes if the notice is remailed.	The Class Notice has been modified accordingly. (Supp. Han Decl., <i>supra</i> , at ¶ 4; Exhibit 3, § III(13).)

Dated: December 9, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

**PROOF OF SERVICE
1013A(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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 shanneyan@justicelawcorp.com

On December 9, 2024, I served the foregoing document described as

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

for the following case: **Analleli Deleon v. Clinica de Salud del Valle de Salinas**
LWDA/Court Case No.: **LWDA Case No.: CM-959301-23**
Court Case No.: 23CV002600
Monterey County Superior Court

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

[X] BY ELECTRONIC SUBMISSION

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.

[X] STATE

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

Executed on December 9, 2024, at Pasadena, California.



Sophia Hanneyan