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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MENDOCINO

ALMA LOPEZ and JOSE REFUGIO LOPEZ
ACEVEDO, individually, and on behalf of
other members of the general public similarly
situated and aggrieved employees pursuant to
the Private Attorneys General Act,

Plaintiffs,

vs.

ADVANCED MANUFACTURING AND
DEVELOPMENT, INC. dba METALFX, a
California corporation; and DOES 1 through
25, inclusive,

Defendants.

Case No. 23CV00673

Honorable Ann C. Moorman
Department E

**SUPPLEMENTAL DECLARATION OF
GARVIN BROWN OF ILYM GROUP,
INC. REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

Date: November 7, 2025
Time: 9:30 a.m.
Dept.: E

Complaint Filed: July 25, 2023
FAC Filed: September 28, 2023
SAC Filed: May 29, 2025
Trial Date: Not Set

1 I, Garvin Brown, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc. (herein after referred to as “ILYM Group”), the professional
4 settlement services provider who has been retained by the Parties’ Counsel and subsequently
5 appointed by the Court to serve as the Settlement Administrator for the above captioned,
6 *Lopez/Acevedo v. Advanced Manufacturing and Development, Inc.* matter. I am authorized to make
7 this declaration on behalf of ILYM Group and myself. I have personal knowledge of the facts
8 herein, and, if called upon to testify, I could and would testify competently to such facts.

9 2. ILYM Group has extensive experience in administering class action settlements,
10 including direct mail services, database management, claims processing and settlement fund
11 distribution services for class actions ranging in size from 26 to 4.5 million settlement class
12 members.

13 3. ILYM Group was engaged by the Parties’ Counsel and subsequently approved and
14 appointed by the Court to provide notification services and settlement administration, pursuant to
15 the terms of the Settlement, in the above referenced Action. Duties performed to-date and to be
16 performed after Final Approval of the Settlement is granted, include: (a) translating the mailing
17 documents into Spanish; (b) printing and mailing the *Court Approved Notice of Class Action*
18 *Settlement and Hearing Date for Final Court Approval*, in both English and Spanish (referred to as
19 “Class Notice”); (c) receiving and processing requests for exclusion and objections to the
20 Settlement, if applicable; (d) resolving Class Members’ and Aggrieved Employees’ disputes over
21 the number of Workweeks and Pay Periods Defendant has record of them working during the Class
22 Period and PAGA Period, which was pre-printed on their individualized Class Notice; (e)
23 establishing a QSF account and calculating individual settlement award amounts; (f) processing
24 and mailing settlement award checks; (g) handling tax withholdings as required by the Settlement
25 and the law; (h) preparing, issuing and filing tax returns and other applicable tax forms; (i) handling
26 the distribution of any unclaimed funds pursuant to the terms of the Settlement; and (j) performing
27 other tasks as the Parties mutually agree to and/or the Court orders ILYM Group to perform.

28

4. As of the date of this declaration, 55 Class Notices have been returned to our office. Of the 55 returned Class Notices, none included a forwarding address. ILYM Group performed a computerized skip trace on the 55 returned Class Notices that did not have a forwarding address, in an effort to obtain an updated address for the purpose of re-mailing the Class Notice. As a result of this skip trace, 32 updated addresses were obtained and the Class Notices were promptly re-mailed to those Class Members, via U.S. First Class Mail. As of the date of this declaration, a total of 23 Class Notices have been deemed undeliverable as no updated addresses were found notwithstanding the skip tracing.

5. As of the date of this declaration, ILYM Group has not received any Requests for Exclusion. The Response Deadline was September 25, 2025.

6. As of the date of this declaration, ILYM Group has not received any objections to the Settlement. The Response Deadline was September 25, 2025.

7. As of the date of this declaration, ILYM Group has received one dispute regarding Workweeks or Pay Periods. However, despite ILYM Group's efforts in obtaining supporting documentation from this Class Member, the Class Member has not provided the necessary information. The Response Deadline was September 25, 2025.

8. As of the date of this declaration, ILYM Group reports a total of 187 Participating Class Members, representing 100.00% of the Class, who worked 6,641 Workweeks.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct to the best of my knowledge and that this Declaration was executed this 13th day of October 2025, at Tustin, California.

Garvin Brown

GARVIN BROWN

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF MENDOCINO

I, Lorena Bautista, certify and declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On October 13, 2025, I served a copy of the following document(s):

- **SUPPLEMENTAL DECLARATION OF GARVIN BROWN OF ILYM GROUP, INC. REGARDING NOTICE AND SETTLEMENT ADMINISTRATION**

On the interested parties as follows:

Spencer C. Skeen
Cameron Davila
Jennifer P. Suberlak
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Attorneys for Plaintiff Jose Refugio Lopez Acevedo

☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered electronically to be delivered to the above referenced addressee(s) via email from email address lbautista@blackstonepc.com pursuant to California Code of Civil Procedure section

1010.6(e)(1). I did not receive any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency

Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

☒ **BY ONLINE SUBMISSION:** The above-referenced documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(I). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on October 13, 2025 at Beverly Hills, California.

/s/ Lorena Bautista

Lorena Bautista