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Attorneys for Plaintiff Elizabeth Petersen

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA – SOUTH COUNTY
ANACAPA DIVISION**

ELIZABETH PETERSEN, on behalf of all
similarly situated persons and aggrieved
employees,

Plaintiffs,

vs.

SUNRUN, INC., and DOES 1-50,

Defendants.

CASE NO.: 26CV03332

[Assigned for all Purposes to the Hon. Thomas
P. Anderle, Dept. 3]

**SUPPLEMENTAL DECLARATION OF
REUBEN D. NATHAN IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
FOR ORDER:**

- 1. GRANTING FINAL APPROVAL OF
PAGA SETTLEMENT**
- 2. APPROVING REQUEST FOR
SETTLEMENT ADMINISTRATOR
COSTS**
- 3. APPROVING REQUEST FOR
ATTORNEYS' FEES AND COSTS;
AND,**
- 4. APPROVING REQUEST FOR
PAGA REPRESENTATIVE
ENHANCEMENT PAYMENT**

Date: July 1, 2026

Time: 10:00 a.m.

Dept: 3

Santa Barbara Superior Court
Anacapa Division
1100 Anacapa Street
Santa Barbara, CA 93101

1 I, REUBEN D. NATHAN, declare as follows:

2 1. I am over the age of eighteen years old and I am mentally competent to attest to the
3 matters set forth in this declaration. I am an attorney at law licensed to practice in the State of
4 California and the District of Columbia, and I am a member of the bar of this Court. I have personal
5 knowledge of the facts set forth in this declaration and, if called as a witness, I could and would
6 testify competently thereto.

7 2. I am the principal attorney at the law firm of Nathan & Associates, APC ("RN"). I
8 am counsel of record for Plaintiff ELIZABETH PETERSEN ("Plaintiff") in this action.

9 3. I am submitting this Supplemental Declaration in support of Plaintiff's Unopposed
10 Motion for Order: Granting Final Approval of PAGA Settlement; Approving Request for
11 Settlement Administrator Costs; Approving Request for Attorneys' Fees and Costs; and
12 Approving Request for PAGA Representative Enhancement Payment ("MFA").

13 **COUNSEL'S AMENDED COSTS**

14 4. Through inadvertence, the MFA briefing and my declaration in support of the MFA
15 filed on June 1, 2026, stated that my firm's total costs were \$11,817.44. I was aware that there
16 was an upcoming bill for the expert services of Briscoe Economics, however, at the time of filing
17 the MFA, I had not yet received the invoice from Briscoe. Therefore, when preparing my costs, I
18 inadvertently left out the bill from Briscoe Economics for \$10,730.00.

19 5. Upon receiving the invoice from Briscoe Economics today, I realized my mistake.

20 6. The correct total for Nathan & Associates, APC's costs incurred is **\$22,547.44**. A
21 breakdown of the costs incurred by Nathan & Associates, APC in this case is set forth in the
22 amended chart below.

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NATHAN & ASSOCIATES, APC - COSTS

TOTAL:

\$22,547.44

ITEM:	Cost	ATTORNEY:	CASE:
Case Filing Fee (Complaint + filing fees and costs)	\$464.94	RDN	PETERSEN
Expert Fees (Briscoe Economics) #1	\$3,852.50	RDN	PETERSEN
Expert Fees (Briscoe Economics) #2	\$10,730.00	RDN	PETERSEN
Mediation Fees	\$7,500.00	RDN	PETERSEN

7. The Parties' Settlement Agreement (Exhibit 1 to the Nathan Declaration, filed on June 1, 2026) allows up to \$20,000 for attorneys' costs subject to Court approval. I therefore request that this court award Nathan & Associates, APC \$20,000 in costs, which is a reduced amount based on my firm's total costs in the amount of \$22,547.44.

AMENDED DISBURSEMENT BREAKDOWN

8. Based on the revised requested amount of attorney's costs in the amount of \$20,000, the amended disbursement breakdown is as follows:

- Gross Settlement Amount: \$2,950,000.00
- Attorneys' fees: \$973,500.00
- Attorneys' costs: \$20,000.00
- PAGA Representative Enhancement Payment: \$10,000.00
- Settlement Administrator's Costs: \$29,950.00
- **Revised Net Settlement Amount: \$1,916,550.00**

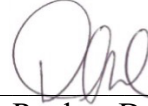
9. Based on the revised Net Settlement Amount, \$1,245,757.50 (65%) will be allocated to the LWDA and \$670,792.50 (35%) will be allocated to the PAGA Aggrieved Employees.

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1 10. Based on the revised allocation to the PAGA Aggrieved Employees, the PAGA
2 Aggrieved Employees will receive an average payment of \$65.03 to be mailed to each of the
3 10,315 PAGA Aggrieved Employees.

4 I declare under penalty of perjury under the laws of the state of California that the foregoing
5 is true and correct.

6 Executed on June 9, 2026 in Newport Beach, California.

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Reuben D. Nathan