

1 Eric K. Yaeckel [CSB No. 274608]

2 yaeckel@sullivanlawgroupapc.com

3 Ryan T. Kuhn [CSB No. 324538]

4 ryan@sullivanlawgroupapc.com

5 Cody D. Archer [CSB No. 361361]

6 cody@sullivanlawgroupapc.com

7 **SULLIVAN & YAECKEL LAW GROUP, APC**

8 2330 Third Avenue

9 San Diego, California 92101

10 (619) 702-6760 | (619) 702-6761 FAX

11 Attorneys for Plaintiff LAVONTRA BREAUX, Individually, and on behalf of other members of the
12 general public similarly situated

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

15 VANESSA HERNANDEZ, LAVONTRA
16 BREAUX, NARON TRIPLETT, and
17 NATALIE FLORES Individually, and on
18 behalf of other members of the general public
19 similarly situated;

20 Plaintiffs,

21 vs.

22 PANDORA JEWELRY LLC, a Maryland
23 Limited Liability Company; PANDORA
24 VENTURES, LLC, a Maryland Limited
25 Liability Company; and DOES 1-10,
26 inclusive,

27 Defendants.

CASE NO. 24STCV04554

[Related Case Nos.: 23SMCV04825;
24SMCV00844; 24STCV04697; and
24STCV15396]

PROOF OF SERVICE ON LWDA

DECLARATION OF SERVICE

I, Christian Y. Struckmeyer, declare:

I am, and was at the time of service of the papers herein referred to, over the age of 18 years, and not a party to this action. I am employed in the office of a member of the bar of this court at whose direction the service was made. My business address is 2330 Third Avenue, San Diego, California 92101.

On November 24, 2025, I served the following document(s):

1. **PLAINTIFFS' AMENDED NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
2. **SUPPLEMENTAL DECLARATION OF ERIC K. YAECKEL IN SUPPORT OF PLAINTIFFS' NOTICE OF THE UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
3. **DECLARATION OF LAVONTRA BREAUX IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF (1) CLASS ACTION SETTLEMENT; (2) ATTORNEYS' FEES AND COSTS; and (3) CLASS REPRESENTATIVE AWARDS;**
4. **CLASS ACTION DECLARATION OF NATALIE FLORES IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
5. **DECLARATION OF JOSHUA FALAKASSA;**
6. **DECLARATION OF VANESSA HERNANDEZ;**
7. **DECLARATION OF MEHRDAD BOKHOUR;**
8. **[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT.**

On The Labor and Workforce Development Agency

Via - PAGA Electronic Filing Portal

(<https://www.Dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>)

BY UPLOADING THE LISTED DOCUMENTS VIA THE PAGA ELECTRONIC FILING PORTAL: as required pursuant to Labor Code 2699(1)(2)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on November 24, 2025 at San Diego, California.


Christian Y. Struckmeyer