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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

VANESSA HERNANDEZ, LAVONTRA
BREAUX, NARON TRIPLETT, and NATALIE
FLORES Individually, and on behalf of other
members of the general public similarly situated

Plaintiff,

v.

PANDORA JEWELRY LLC, a Maryland
Limited Liability Company; PANDORA
VENTURES, LLC, a Maryland Limited Liability
Company; and DOES 1-10, inclusive

Defendants

Case No. 24STCV04554

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

**DECLARATION OF NICOLE BENCH
OF ILYM GROUP, INC. REGARDING
NOTICE AND SETTLEMENT
ADMINISTRATION**

HEARING INFO

Date: June 5, 2026

Time: 11:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept.: 12

1 I, Nicole Bench, 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, *Hernandez*
6 *v. Pandora Jewelry LLC & Pandora Ventures, LL*, matter. I am authorized to make this declaration
7 on behalf of ILYM Group and myself. I have personal knowledge of the facts herein, and, if called
8 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) printing and mailing the
17 *Notice of Class Action and PAGA Settlement, Request For Exclusion Form, and Objection Form*,
18 (referred to as “Notice Packet”); (b) receiving and processing requests for exclusion and objections
19 to the Settlement, if applicable; (c) resolving Settlement Class Members’ disputes over the number
20 of shifts Worked Defendant has record of them working during the Class Period, which was pre-
21 printed on their individualized Class Notice Packet; (d) establishing a QSF account and calculating
22 individual settlement award amounts; (e) processing and mailing settlement award checks; (f)
23 handling tax withholdings as required by the Settlement and the law; (g) preparing, issuing and
24 filing tax returns and other applicable tax forms; (h) handling the distribution of any unclaimed
25 funds pursuant to the terms of the Settlement; and (i) performing other tasks as the Parties mutually
26 agree to and/or the Court orders ILYM Group to perform.

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1 4. On December 11, 2025, ILYM Group received the Court approved text for the
2 Notice Packet from Class Counsel. ILYM Group prepared a draft of the formatted Notice Packet,
3 which was approved by the Parties' Counsel prior to mailing.

4 5. On January 12, 2026, ILYM Group received the class data file from Counsel for
5 Defendant, which contained the name, social security number, last known mailing address, last
6 known telephone number, the dates of employment worked for each individual, the number of Shift
7 Worked for each Settlement Class Member during the Class Period and the number of Pay Periods
8 worked for each PAGA Employee during the PAGA Period. The data file was uploaded to our
9 database and checked for duplicates and other possible discrepancies. The Class List contained
10 2,716 individuals.

11 6. As part of the preparation for mailing, all 2,716 names and addresses contained in
12 the Class List were then processed against the National Change of Address ("NCOA") database,
13 maintained by the United States Postal Service ("USPS"), for purposes of updating and confirming
14 the mailing addresses of the Settlement Class Members before mailing of the Notice Packet. The
15 NCOA contains requested change of addresses filed with the USPS. To the extent that an updated
16 address was found in the NCOA database, the updated address was used for the mailing of the
17 Notice Packet. To the extent that no updated address was found in the NCOA database, the original
18 address provided by Counsel for Defendants was used for the mailing of the Notice Packet.

19 7. On January 26, 2026, the Notice Packet was mailed, via U.S First Class Mail, to all
20 2,716 individuals contained in the Class List. Attached hereto, as **Exhibit A**, is a true and correct
21 copy of the mailed Notice Packet.

22 8. As of the date of this declaration, 253 Notice Packets have been returned to our
23 office as undeliverable. Of the 253 returned Notice Packets, none included a return with a
24 forwarding address provided by the USPS. ILYM Group performed a computerized skip trace on
25 all 253 returned Notice Packets that did not have a forwarding address, in an effort to obtain an
26 updated address for the purpose of re-mailing the Notice Packet. As a result of this skip trace, 168
27 updated addresses were obtained and the Notice Packets were promptly re-mailed to those
28 Settlement Class Members, via U.S. First Class Mail.

1 9. As of the date of this declaration, a total of 168 Notice Packets have been re-mailed
2 as a result of ILYM Group's skip tracing efforts.

3 10. As of the date of this declaration, a total of 85 Notice Packets have been deemed
4 undeliverable as no updated addresses were found notwithstanding the skip tracing.

5 11. As of the date of this declaration, ILYM Group has received 2 requests for exclusion
6 from the following individuals: Kristine Ghukasyan and Tammara Lopez. The deadline to request
7 exclusion from the Settlement was March 27, 2026. The deadline to request exclusion from the
8 Settlement for Class Members who received a re-mailed Notice Packet is April 13, 2026. (15 days
9 from the original response deadline of March 27, 2026, for the re-mailed Notice Packets.

10 12. As of the date of this declaration, ILYM Group has received 2 written objections to
11 the Settlement, and the correspondence were forwarded to Counsel for review. The deadline to mail
12 a written objection to the Settlement was March 27, 2026. The deadline to mail a written objection
13 to the Settlement for Class Members who received a re-mailed Notice Packet is April 13, 2026. (15
14 days from the original response deadline of March 27, 2026, for the re-mailed Notice Packets.
15 Attached hereto, as **Exhibit B**, are the true and correct copies of the objections received.

16 13. As of the date of this declaration, ILYM Group has not received any disputes from
17 a Settlement Class Member during the response period.

18 14. As of the date of this declaration, ILYM Group will report a total of 2,714
19 Participating Class Members, representing 99.93% of the 2,716 Settlement Class Members. The
20 Total Shifts Worked by the Participating Class Members during the Class Period is 381,185. The
21 Escalator Clause has not been triggered.

22 15. Participating Class Members will receive a proportional share of the Net Fund Value
23 through individual settlement payments, based on the number of Shifts Worked by the Class
24 Members during the Class Period. The Net Fund Value is the amount remaining after deduction of
25 the Court-approved payments from the Gross Fund Value for Class Counsel Attorney Fees and
26 Costs, the Class Representative Service Awards, Settlement Administration Costs to ILYM Group,
27 and the PAGA Penalties allocation, e.g.,

28 ///

1	Gross Fund Value	\$2,850,000.00
2	Attorney's Fees	\$949,905.00
3	Attorney Costs	\$75,000.00
4	Service Award to Lavontra Breau	\$10,000.00
5	Service Award to Vanessa Hernandez	\$10,000.00
6	Service Award to Naron Triplett	\$10,000.00
7	Service Award to Natalie Flores	\$10,000.00
8	Administration Costs to ILYM Group	\$19,950.00
9	PAGA Penalties Allocation to LWDA	\$213,750.00
10	PAGA Penalties Allocation to Aggrieved Employees	\$71,250.00
11	Net Fund Value	\$1,480,145.00

12 16. To determine each Participating Settlement Class Member's Individual Settlement
13 Payment, the Net Fund Value shall be divided among the Participating Class Members based on
14 the Class Member's total number of Shifts Worked during the Class Period. This results into a Per
15 Shift Value and is then multiplied by the number of Shifts Worked by each Class Member during
16 the Class Period. Based on these calculations, the Participating Class Members will receive an
17 estimated average gross payment of \$545.37, with the estimated highest gross payment being
18 \$4,073.28 and the estimated lowest gross payment being \$3.88.

19 17. In addition, ILYM Group will report a total of 2,238 Aggrieved Employees who
20 worked 51,399 Pay Periods during the PAGA Period. The payments to the PAGA Employees will
21 be calculated based on the Aggrieved Employee's total number of Pay Periods worked during the
22 PAGA Period. This results into the PAGA Pay Period Value and is then multiplied by the number
23 of Pay Periods worked by each Aggrieved Employee during the PAGA Period. Based on these
24 calculations, the PAGA Employee's, will receive an estimated average payment of \$31.84, with
25 the estimated highest payment being \$102.58 and the estimated lowest payment being \$1.39.

26 18. ILYM Group's total fees and costs for services in connection with the administration
27 of this Settlement, which includes fees and costs incurred to-date, as well as anticipated fees and
28 costs for completion of the settlement administration, are \$19,950.00. ILYM Group's work in

1 connection with this matter will continue with the calculation of the settlement award payments,
2 issuance and mailing of the settlement award checks, the necessary tax filing and reporting on such
3 payments, and any other tasks that the Parties mutually agree to and/or the Court orders ILYM
4 Group to perform.

5 I declare under penalty of perjury under the laws of the State of California and the United
6 States that the foregoing is true and correct to the best of my knowledge and that this Declaration
7 was executed this 12th day of May 2026, at Tustin, California.

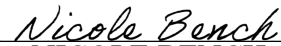
8
9 
NICOLE BENCH

EXHIBIT “A”

**NOTICE OF CLASS AND PAGA ACTION
SETTLEMENT**

PLEASE READ CAREFULLY AS
THIS NOTICE MAY AFFECT YOUR RIGHTS

VANESSA HERNANDEZ, LAVONTRA BREAUX, NARON TRIPLETT, and NATALIE FLORES, Individually, and on behalf of other members of the general public similarly situated, Plaintiffs, v. PANDORA JEWELRY LLC, a Maryland Limited Liability Company; PANDORA VENTURES, LLC, a Maryland Limited Liability Company; and DOES 1-10, inclusive, Defendants.	CASE NO.: 24STCV04554 JUDGE: Hon. Carolyn B. Kuhl COURT: Los Angeles Superior Court, Spring Street DEPT.: 12 NOTICE OF CLASS AND PAGA ACTION SETTLEMENT
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I. WHY DID I GET THIS NOTICE?

A proposed settlement has been reached in the above-referenced putative class and PAGA action (“*Hernandez*”) currently pending in the Superior Court of California for the County of Los Angeles. The proposed settlement encompasses and consolidates claims asserted in this case and in four other related cases: *LaVontra Breaux v. Pandora Jewelry, LLC, et al*, Los Angeles Superior Court, Case No. 23SMCV04825 (“*Breaux*”), *Natalie Flores v. Pandora Ventures, LLC*, Orange Superior Court, Case No. 30-2024-01377405-CU-OE-CXC (“*Flores*”); *Naron Triplett v. Pandora Ventures, LLC et al.*, Los Angeles Superior Court, Case No. 24STCV04697; and *Naron Triplett v. Pandora Ventures, LLC et al.*, Los Angeles Superior Court, Case No. 24SMCV00844 (together with 24STCV04697, “*Triplett*”). Collectively, these five cases are referred to herein as the “Action”.

This notice is to inform you of the proposed settlement of the Action, subject to Court approval. The notice is also intended to (i) describe the settlement, including how the settlement monies will be allocated and how the settlement may affect you; and (ii) advise you of your rights and options with respect to the settlement. ***The Court has not determined who is right or wrong in this lawsuit.***

You are receiving this notice by order of the Court because the records of Pandora Jewelry, LLC and/or Pandora Ventures, LLC (hereinafter referred to collectively as “Pandora”) indicate that you are a current or former non-exempt, hourly paid employee of Pandora who worked in California during the time period of February 2, 2020 to June 1, 2025. As a result, you may be eligible to receive a portion of the settlement amount.

This is a Court-approved notice. This is not an advertisement.

You are not being sued. Your legal rights may be affected whether you act or not.

II. WHAT IS THE LAWSUIT ABOUT?

On October 13, 2023, Lavontra Breaux filed a putative class action lawsuit alleging California Labor Code violations and to recover penalties on behalf of herself and other alleged “Aggrieved Employees” pursuant to California’s Labor Code Private Attorneys General Act (“PAGA”) for these various alleged violations of the Labor Code purportedly committed by Pandora. The *Breaux* action is pending before Department 12 of the Superior Court of California, County of Los Angeles.

On February 2, 2024, Natalie Flores filed a putative wage and hour Class Action Complaint in the Superior Court of California, County of Orange, alleging similar claims.

On February 23, 2024, Naron Triplett filed a putative wage and hour Class Action Complaint for Damages in the Superior Court of California, County of Los Angeles, alleging similar claims. And, also on February 23, 2024, Naron Triplett also filed a Complaint in the Superior Court of California, County of Los Angeles, entitled *Naron Triplett v. Pandora Ventures, LLC et al.*, Case No. 24SMCV00844, asserting a PAGA claim for civil penalties.

On February 23, 2024, Vanessa Hernandez filed a putative wage and hour Class Action Complaint in the Superior Court of California, County of Los Angeles, alleging similar claims.

Lavontra Breaux, Natalie Flores, Naron Triplett, and Vanessa Hernandez are the “Plaintiffs” in the Action. As part of the proposed settlement, the Plaintiffs have filed a First Amended Complaint in the *Breaux* matter, which combines claims brought by all Plaintiffs. Plaintiffs asserted claims against Pandora on behalf of Class Members and Aggrieved Employees for failure to pay regular, minimum, or overtime wages, or final wages upon separation from employment, including vacation pay, failure to provide meal and rest periods, failure to pay vacation wages, failure to reimburse for all business-related expenses, failure to provide wage statements with the required information, unfair and/or unlawful business practices, failure to properly pay, track, and/or pay out at termination vacation pay, failure to properly or timely respond to requests for employee records, and civil penalties pursuant to PAGA.

Pandora denies any and all wrongdoing and liability. Pandora contends that they conducted business and compensated employees consistent with the laws of the State of California. Pandora contends that they have no liability for any claims under any statute, wage order, common law, or equitable theory. The Court has not ruled on the merits of Plaintiffs’ claims or allegations.

III. WHO IS INCLUDED IN THIS ACTION?

“Class Member(s)” include all non-exempt, hourly paid persons who worked for Pandora in the State of California at any time during the time period of February 2, 2020, through June 1, 2025 (the “Class Period”). Those identified as Class Members will comprise the class Plaintiffs will request the Court conditionally certify for settlement purposes only.

In addition, “Aggrieved Employee(s)” include all non-exempt, hourly paid persons who worked for Pandora in the State of California at any time during the period of August 9, 2022, through June 1, 2025 (the “PAGA Period”).

IV. WHAT DOES THE PROPOSED SETTLEMENT PROVIDE?

On September 30, 2025, the Plaintiffs and Pandora executed a Class Action and PAGA Settlement and Release Agreement (the “Settlement”) as a compromise that resolves the class and PAGA claims asserted in the Action. The Settlement is subject to Court approval. On December 11, 2025, the Court preliminarily approved the Settlement and conditionally certified the Class for settlement purposes only.

The Settlement is the result of good faith and arms-length negotiations between Plaintiffs and Pandora. Each side agrees that given the risks and expense associated with continued litigation, this Settlement is fair and appropriate under the circumstances, and is in the best interests of the Class Members and Aggrieved Employees. Please be advised that the Court has not ruled on the merits of Plaintiffs’ claims or Pandora’s defenses. This means the Court has not made any determination of who is right or wrong, or that Plaintiffs could establish any of the requisite elements for class or collective treatment of any of the claims asserted, or that the PAGA claims alleged could proceed on a representative basis.

Under the terms of the proposed Settlement, Pandora will pay **Two Million Eight Hundred Fifty Thousand Dollars and Zero Cents** (\$2,850,000.00) (the “**Gross Fund Value**”) in exchange for a release of the class and PAGA claims asserted by Plaintiffs on behalf of all Class Members and Aggrieved Employees.

A claims administrator has been appointed by the Court to administer the settlement. The claims administrator will pay from the Gross Fund Value the following amounts: (1) Plaintiffs’ counsel’s attorneys’ fees, up to 33 & 1/3% of the settlement value (or \$949,905.00); (2) Plaintiffs’ counsel’s costs of litigation, up to the amount of \$75,000.00; (3) the expenses of administering the settlement, up to the amount of \$19,950.00; (4) an enhancement award of up to \$40,000.00 (\$10,000.00 to each Plaintiff) for their role in pursuing the litigation; (5) a payment of \$213,750.00 to the California Labor & Workforce Development Agency, representing 75% of the \$285,000.00 allocated to the settlement of the claim for civil penalties under PAGA; and (6) a payment of \$71,250.00 to the Aggrieved Employees, representing 25% of the \$285,000.00 allocated to the settlement of the claim for civil penalties under PAGA. After deducting the preceding amounts from the Gross Fund Value, the remaining amount (the “Net Fund Value”) will be distributed as individual settlement payments to Class Members who do not exercise their right to opt out of the Settlement as provided in Section V below.

Each Class Member's individual settlement payment will be calculated by dividing the Net Fund Value by the estimated total number of shifts worked by all Class Members during the Class Period to arrive at a per-shift figure. For each Class Member, that per-shift figure will then be multiplied by the number of shifts the Class Member worked during the Class Period to determine each Class Member's pro rata portion of the Net Fund Value (their "Individual Settlement Payment"). Pandora will provide the settlement administrator with the necessary data for this determination based on their records. Of each Individual Settlement Payment, 20% will be deemed a recovery of wages, for which a W-2 tax form will be issued, and the remaining 80% will be deemed the recovery of interest and penalties for which a Form 1099 will be issued.

Additionally, with respect to the portion of the Gross Fund Value allocated to Aggrieved Employees for civil penalties under PAGA, that amount will be distributed to Aggrieved Employees who worked for Pandora in California between August 9, 2022, and June 1, 2025. Each Aggrieved Employee's individual PAGA payment will be calculated by dividing this amount by the estimated total number of pay periods worked by all Aggrieved Employees during the PAGA Period to arrive at a per-pay period figure. For each Aggrieved Employee, that per-pay period figure will then be multiplied by the number of pay periods the Aggrieved Employee worked during the PAGA Period to determine each Aggrieved Employee's pro rata portion (the "Individual PAGA Payment"). Each Individual PAGA Payment will be deemed a recovery of penalties for which a Form 1099 will be issued.

Pandora's records indicate that you worked a total of «Class Shifts» shifts during the Class Period. Based on this estimate and Pandora's records, your estimated Individual Settlement Payment is \$«Class Est Payment». [Pandora's records also indicate that you worked a total of «PAGA Pay Periods» pay periods during the PAGA Period, and your estimated Individual PAGA Payment is \$«PAGA Est Payment»]. These are only estimates. Your actual payments may change depending on the Court's final ruling and the final number of participating Class Members.

You have the opportunity, should you disagree with Pandora's records regarding the number of shifts and PAGA pay periods you worked as reflected above, to challenge the figure(s), including by providing documentation to show contrary employment dates. To do so, you must contact the settlement administrator and provide all evidence to support your dispute prior to the Opt-Out/Objection Deadline outlined in Section VI(B) below. However, you cannot submit a dispute regarding the number of shifts reflected in this notice if you exercise the right to opt out of the Class and Settlement. **Subject to Court approval, you do not need to take any further action to receive money from this Settlement.**

V. WHAT AM I RELEASING UNDER THE SETTLEMENT?

If and when the Court grants final approval of the Settlement, upon the Effective Date and upon Pandora fully funding the Settlement, all Class Members and/or Aggrieved Employees will release the following claims:

All Class Members who do not opt out of the Settlement will release and discharge Pandora and the "Released Parties" for the Class Period from all causes of action, claims, and theories pled in the Action, and specifically in the First Amended Complaint which is filed under the lead Hernandez Case, pending in Los Angeles Superior Court Case No. 24STCV04554.

"Released Parties" means and refers to Pandora and their franchisee, Ben Bridge Jeweler, Inc., and each of their respective former and present parent companies, subsidiaries, divisions, related or affiliated companies, franchisees or franchisors, directors, officers, shareholders, owners, members, employees, agents, principals, representatives, attorneys, insurers, predecessors, successors, and assigns, and any individual or entity that could be liable for any of the Released Class Claims or Released PAGA Claims, to the extent they employed or otherwise could be liable to Class Members during the Class Period for any of the Released Class Claims and/or Aggrieved Employees during the PAGA Period for any of the Released PAGA Claims, and Pandora's Counsel in the Actions.

All Aggrieved Employees will release and discharge Pandora and the Released Parties for the PAGA Period from all causes of action, claims, and theories for civil penalties under PAGA, Labor Code section 2698 et seq. pled in the Action, and specifically in the First Amended Complaint which is filed under the lead Hernandez Case, pending in Los Angeles Superior Court Case No. 24STCV04554

Settlement checks returned as undeliverable or those Settlement checks remaining uncashed for more than 180 days after issuance shall be distributed to the Controller of the State of California to be held pursuant to the Unclaimed Property Law for the benefit of those Class Members and/or Aggrieved Employees and until they claim their property.

VI. WHAT ARE MY OPTIONS?

A. *You may participate in the Settlement, accept your share, and be bound by the release of all claims described above.* Under the Settlement, you will automatically receive an Individual Settlement Payment unless you opt out of the Class by following the opt-out procedures set forth below. If approved by the Court, the Settlement and its releases will be binding on all Class Members who do not timely opt out. Settlement awards will be paid by check from the settlement administrator after the Settlement is given final approval by the Court.

OR

B. *You may exclude yourself from the Settlement, in which case you will not receive an Individual Class Payment and you will not be bound by the Settlement as to the release of class claims.* If you wish to be excluded from participating in the Settlement, you must mail a written statement to the Settlement Administrator, at the address below, requesting to be excluded. To be considered valid, your request for exclusion must be in writing, signed by you, and contain your name, address, telephone number, and Social Security Number. You may, but are not required, to use the Opt-Out/Request for Exclusion form accompanying this Notice. Your request for exclusion must clearly indicate that you desire to be excluded from the Settlement. To be considered timely, your request for exclusion must be received or postmarked no later than **March 27, 2026** (60 calendar days after mailing of this Notice), the “Opt-Out/Objection Deadline”.

If you are also an Aggrieved Employee, you will automatically receive an Individual PAGA Payment. You will receive this payment regardless of whether you exercise the right to opt out of the Class.

Your decision about whether or not to participate in this Settlement will not affect your employment or potential for re-employment with Pandora.

OR

C. *You may object to the settlement.* If you wish to object to the Settlement or some part of it, you may advise the Court of your objection in writing stating why you object to the Settlement. Your objection must state your full name; your Social Security Number; approximate dates of employment; address; telephone number; a statement providing the basis for your objection; a statement identifying any legal counsel they have retained to represent them with respect to the objection; and any legal briefs, papers, or memoranda you propose to submit to the Court. The objection must be delivered or mailed to the settlement administrator, at the address below, and if mailed must be postmarked no later than the Opt-Out/Objection Deadline. You may, but are not required, to use the Notice of Objection form accompanying this Notice.

You may also, if you wish, appear at the Final Approval Hearing on **June 5, 2026, at 11:30 a.m.**, in Department 12 of the Los Angeles Superior Court to discuss your objections with the Court and the Parties regardless of whether or not you submitted a written objection to the settlement administrator. You are not required to attend the hearing. If you object to the Settlement, you may still receive an Individual Settlement Payment if the Court approves the Settlement despite any objections.

VII. EXAMINATION OF COURT PAPERS AND QUESTIONS

This Notice summarizes the Settlement. For more detailed information, you may view a complete copy of the settlement agreement, and any papers filed in the Action, which are on file with the Clerk of the Los Angeles Superior Court, case number 24STCV04554. The pleadings and all other records from this litigation may be examined by inspecting the Court file in the filing department of the Los Angeles Superior Court, located at Spring Street Courthouse, 312 N. Spring St., Los Angeles, CA 90012. You may also review the settlement agreement, along with other court records regarding this case, on the Court’s website, <https://www.lacourt.ca.gov/pages/lp/access-a-case> through the link to the “Register of Actions.”

If you need more information or have any questions, you can call the Claims Administrator, ILYM Group, Inc., P.O. Box 2031, Tustin, CA , 92781, at (888) 250-6810, Claims@ILYMgroup.com or any of Class Counsel (see below for phone numbers).

VIII. WHO ARE THE ATTORNEYS REPRESENTING THE PARTIES?

Attorneys for Plaintiffs and the Class

Class Counsel, appointed and approved by the Court for settlement purposes only, will represent you. However, you may choose to be represented by your own counsel at your own cost. Class Counsel is seeking an award from the Court for attorneys’ fees of up to \$949,905.00 and documented litigation costs of up to \$75,000.00.

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**PLEASE DO NOT CALL OR WRITE THE COURT ABOUT THIS
NOTICE.**

**THIS NOTICE IS NOT A RECOMMENDATION BY THE COURT AS TO ANY
ACTION YOU SHOULD OR SHOULD NOT TAKE**

*****THIS IS NOT AN ADVERTISEMENT FROM A LAWYER*****

OPT-OUT/REQUEST FOR EXCLUSION

Submit this Request For Exclusion form no later than March 27, 2026, only if you want to opt out of (not participate in) the settlement of the actions known as *Hernandez, et al. v. Pandora Jewelry LLC, et al.*, Los Angeles County Superior Court Case Nos. 23SMCV04825, 24STCV0455, 24STCV04697, 24SMCV00844; Orange County Superior Court Case No. 30-2024-01377405-CU-OE-CXC (altogether, the “Action”). Do not submit this exclusion form if you wish to receive money from the class settlement.

I have reviewed the Notice of Class Action and PAGA Settlement and Release Agreement and understand that a person is a Class Member in the Action if he or she is a current or former non-exempt, hourly paid employee of Pandora Jewelry LLC or Pandora Ventures, LLC in the State of California at some point between the period February 2, 2020 through June 1, 2025. I understand that this settlement is intended to compensate such Class Members.

I understand that I may exclude myself from, or “opt out” of, the class settlement of the Action. I understand that, in any separate lawsuit, I may receive nothing or less than I would have received if I had participated in the settlement. I understand that any separate lawsuit by me will be undertaken at my own expense and at my own risk. I understand that counsel for the class will not represent my interests if I opt out.

I understand that if I do not opt out, I will receive a payment if the class settlement of the Action is approved by the Court. ***I understand that, by requesting to be excluded from the class settlement, I will receive no money from the class settlement in accordance with the Class Action and PAGA Settlement and Release Agreement entered by the parties to the Action.*** I understand that, to the extent I am an “Aggrieved Employee,” as explained in the Class Notice, my decision to opt out will not exclude me from the Settlement with respect to the released PAGA claims. No one has coerced or forced me to opt out; it is my own decision.

I opt out of the settlement.

Print Name: _____

Address: _____

The last four digits of your Social Security Number: _____

Signature: _____ Date: _____

IN ORDER TO BE VALID, THIS REQUEST FOR EXCLUSION FORM MUST BE COMPLETED, SIGNED, MAILED BY FIRST CLASS MAIL, AND POSTMARKED ON OR BEFORE MARCH 27, 2026. Send this signed request for exclusion form to the Settlement Administrator at:

Hernandez, et al. v. Pandora Jewelry LLC, et al., Settlement
c/o ILYM Group, Inc.
P.O. Box 2031, Tustin, CA 92781
Telephone: (888) 250-6810
Fax: (888) 845-6185
E-mail: claims@ilymgroup.com

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OBJECTION TO SETTLEMENT

Submit this Objection To Settlement form only if you want to object to the settlement of the actions known as *Hernandez, et al. v. Pandora Jewelry LLC, et al.*, Los Angeles Superior Court Case Nos. 23SMCV04825, 24STCV0455, 24STCV04697, 24SMCV00844; Orange County Superior Court Case No. 30-2024-01377405-CU-OE-CXC (altogether, the “Action”).

I have reviewed the Notice of Class Action and PAGA Settlement and Release Agreement and understand that a person is a Class Member in the Action if he or she is a current or former non-exempt, hourly paid employee of Pandora Jewelry LLC or Pandora Ventures, LLC in the State of California at some point between the period February 2, 2020 through June 1, 2025. I understand that this settlement is intended to compensate such Class Members.

I understand that if I object to the settlement, and my objection is overruled, I will still be included as a Class Member and part of the settlement and release of class claims. I understand that if I do not want to be included as part of the settlement, I should instead submit the separate form titled “Opt-Out/Request for Exclusion”. I understand that I should not submit both an Objection to Settlement form and an Opt-Out/Request for Exclusion Form because if I do my objection(s) will be disregarded and I will be excluded from the settlement and release of class claims.

I wish to object to the settlement reached in the Action. The nature and basis for my objection are:

Print Name: _____

Address: _____

The last four digits of your Social Security Number: _____

Signature: _____ Date: _____

Name / Address of Attorney (If Applicable): _____

Check if Applicable: [] I intend to appear at the Final Approval Hearing.

IN ORDER TO BE VALID, THIS OBJECTION FORM MUST BE COMPLETED, SIGNED, MAILED BY FIRST CLASS MAIL, AND POSTMARKED ON OR BEFORE **MARCH 27, 2026**. Send this signed objection form to the Settlement Administrator at:

Hernandez, et al. v. Pandora Jewelry LLC, et al., Settlement

c/o ILYM Group, Inc.

P.O. Box 2031, Tustin, CA 92781

Telephone: (888) 250-6810

Fax: (888) 845-6185

E-mail: claims@ilymgroup.com

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«Case_Name»

c/o ILYM Group, Inc.

P.O. Box 2031

Tustin, CA 92781

«ILYMID

QR

Code»

ILYM ID: «ILYMID»

«first_name» «last_name»

«Address_1»

«City», «state» «Zip_Code»

EXHIBIT “B”

OBJECTION TO SETTLEMENT

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I wish to object to the settlement reached in the Action. The nature and basis for my objection are:

Print Name: Catherine Rashed
Address: 6051 Pomegranate Lane Woodland Hills, CA 91367
The last four digits of your Social Security Number: 5832
Signature: Catherine Rashed Date: 3/25/26

Name / Address of Attorney (If Applicable): _____

Check if Applicable: ☐ I intend to appear at the Final Approval Hearing.

IN ORDER TO BE VALID, THIS OBJECTION FORM MUST BE COMPLETED, SIGNED, MAILED BY FIRST CLASS MAIL, AND POSTMARKED ON OR BEFORE **MARCH 27, 2026. Send this signed objection form to the Settlement Administrator at:**

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c/o ILYM Group, Inc.
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Telephone: (888) 250-6810
Fax: (888) 845-6185
E-mail: claims@ilymgroup.com

YOU SHOULD KEEP A COPY OF THIS DOCUMENT FOR YOUR RECORDS. YOU MAY WISH TO MAIL IT RETURN RECEIPT REQUESTED.

Rashada
6051 Pomegranate Lane
Woodland Hills, CA 91367

SANTA CLARITA CA 913

27 MAR 2026 PM 6 L



Hernandez, et al. v. Pandora Jewelry LLC, et al., Settlement
c/o ILYM Group, Inc
P.O. Box 2031
Tustin, CA 92781

92781-203131



OBJECTION TO SETTLEMENT

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I wish to object to the settlement reached in the Action. The nature and basis for my objection are:

- The settlement dose not fairly reflect my work, the discrimination I experienced, or the harm I endured.
- I worked 440 shifts but only receiving \$1,707.50 (about \$0.49/shift)
- Attorney fees of \$949,905.00 (40% of the total) were not fully disclosed or agreed upon.

Print Name: Naren Sous Triplett

Address: 750 Harrison Street, Apt 905, San Francisco, CA 94107

The last four digits of your Social Security Number: 5117

Signature: [Signature] Date: 02/05/2026

Name / Address of Attorney (If Applicable): Lawyers for Justice, PC.

Check if Applicable: ☒ I intend to appear at the Final Approval Hearing.

IN ORDER TO BE VALID, THIS OBJECTION FORM MUST BE COMPLETED, SIGNED, MAILED BY FIRST CLASS MAIL, AND POSTMARKED ON OR BEFORE **MARCH 27, 2026**. Send this signed objection form to the Settlement Administrator at:

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Naron Sous Triplett
750 Harrison Street, Apt 905
San Francisco, CA 94107
narontriplett@gmail.com
214-906-9327
02/05/2026

CASE NO.: 24STCV04554
JUDGE: Hon. Carolyn B. Kuhl
COURT: Los Angeles Superior Court, Spring Street
DEPT.: 12

Dear Your Honor and Settlement Administrator,

I respectfully submit this letter to formally object to the proposed settlement in the above-referenced matter involving Pandora Jewelry, LLC and Pandora Venture, LLC. While I acknowledge and appreciate the efforts made to resolve this case, I believe the proposed settlement does not adequately compensate me for the full extent of the harm and mistreatment I endured during my employment.

From August 14, 2018 through September 18, 2023, I experienced ongoing workplace mistreatment, including excessive workloads, denial of legally required breaks, and discriminatory treatment related to my accent and background. These conditions caused significant emotional distress and financial hardship.

Under the proposed settlement, I have been allocated \$1,707.50 for 440 worked shifts during the class period, which equates to approximately \$0.49 per hour. This amount does not account for extensive overtime, overnight shifts, loss of personal time, or the cumulative impact these conditions had on my overall well-being.

Additionally, from the total settlement amount of \$2.8 million, deductions totaling \$1,369,855 for attorney's fees and costs substantially reduce the compensation available to class members. Prior to initiating this case, I was verbally informed by my attorney, Melissa LeBlanc-Mansell, that my retainer fee would not exceed \$50,000. However, attorney's fees exceeding \$949,905 (40% of the total) appear disproportionately high in comparison to my individual recovery and were neither fully disclosed to me nor agreed upon.

For these reasons, I respectfully request that the Court carefully review the fairness and reasonableness of the proposed settlement allocation and consider an adjustment that more accurately reflects the damages and hardship I endured.

Thank you for your time and consideration. I remain hopeful for a resolution that fairly reflects the justice I deserve.

Respectfully,

Naron Sous Triplett


02/05/2026

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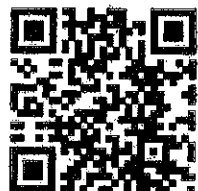
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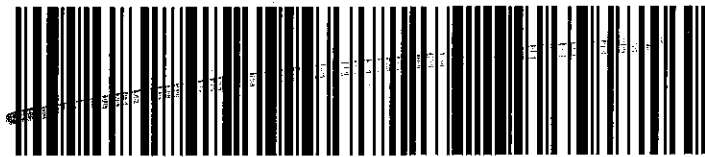
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