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Attorneys for Plaintiff Karla Reyes

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KARLA REYES, individually, and on behalf of all
others similarly situated,

Plaintiff,

vs.

NAKI CLEANING SERVICES, INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 23STCV22699

CLASS AND REPRESENTATIVE ACTION

**SUPPLEMENTAL DECLARATION OF
KANE MOON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: June 25, 2026

Time: 11:00 a.m.

Dept.: 7

Judge: Hon. Samantha P. Jessner

Action Filed: September 19, 2023

FAC Filed: February 9, 2024

Trial Date: Not set

I, KANE MOON, declare as follows:

2. I submit this Supplemental Declaration in response to the Court's May 11, 2026 checklist regarding Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

4. The Parties revised the Settlement Agreement and Class Notice to clearly indicate that Defendant's employer's side payroll taxes will be paid from the Gross Settlement Amount. In Plaintiff's original moving papers, Plaintiff's Counsel incorrectly stated that Defendant would separately pay employer-side payroll taxes in addition to the Gross Settlement Amount. That statement was inadvertent and mistaken. The Parties' agreement has always been that employer-side payroll taxes would be paid from the Gross Settlement Amount, as reflected in the Settlement Agreement.

1 and withholding obligations because the taxability of proceeds depends on the
2 nature of the claim and basis of recovery).

3 5. The Parties revised the Settlement Agreement and Class Notice to ensure consistency
4 regarding the tax allocation of Individual Class Payments. The revised documents now consistently state
5 the applicable allocation between wages and penalties/interest.

6 6. A true and correct copy of the fully executed Amended Class Action Agreement and Class
7 Notice (the “First Amended Long Form”) is attached hereto as **Exhibit 1**. A true and correct copy of the
8 Class Notice is attached as Exhibit A to the First Amended Long Form. A true and correct copy of the
9 redlined Amended Class Action Agreement and Class Notice showing the changes effected by the
10 Amendment and the changes made to the Class Notice is attached hereto as **Exhibit 2**.

11 7. The First Amended Long form has been submitted to the California Labor and Workforce
12 Development Agency (the “LWDA”). A true and correct copy of the submission confirmation email
13 from the LWDA is attached hereto as **Exhibit 3**.

14 8. A revised [Proposed] Order reflecting the First Amended Long Form is filed concurrently
15 herewith. A true and correct copy of the redlined [Proposed Order] is attached hereto as **Exhibit 4**.

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17 I declare under penalty of perjury under the laws of the State of California and the United
18 States that the foregoing is true and correct. Executed on June 18, 2026, at Los Angeles, California.

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20 _____
21 Kane Moon
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