

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)

slidman@lidmanlaw.com

Tiara Gose-Hardy (SBN 323823)

tgose@lidmanlaw.com

Milan Moore (SBN 308095)

mmoore@lidmanlaw.com

2155 Campus Drive, Suite 150

El Segundo, California 90245

Tel: (424) 322-4772

Fax: (424) 322-4775

Attorneys for Plaintiff

CATHERINE ANDERSON and the Proposed Class

(ADDITIONAL COUNSEL ON NEXT PAGE)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CATHERINE ANDERSON, as an
individual and on behalf of all others
similarly situated; JOSE RODRIGUEZ, as
an individual on behalf of himself and all
other similarly situated,

Plaintiffs,

vs.

KINDER MORGAN, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. 23STCV25789

Assigned to the Hon. Laura A. Seigle, Dept.
SSC-17

**SUPPLEMENTAL BRIEF IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT & PAGA SETTLEMENT**

Hearing Information:

Date: December 18, 2025

Time: 9:00 AM

Dept.: 17

[Filed concurrently with: (1) Supplemental
Declaration of George S. Azadian, Esq. (2)
Amended [Proposed] Order.]

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
CATHERINE ANDERSON and the Proposed Class

AZADIAN LAW GROUP, PC

George S. Azadian (SBN 253342)
george@azadianlawgroup.com
Ani Azadian (SBN 284007)
ani@azadianlawgroup.com
707 Foothill Blvd., Suite 200
La Canada Flintridge, California 91011
Tel: (626) 449-4944
Fax: (626) 628-1722

Attorneys for Plaintiff, JOSE RODRIGUEZ and the Proposed Class

I. INTRODUCTION

Plaintiffs Catherine Anderson and Jose Rodriguez (collectively, “Plaintiffs”), submit this supplemental brief in support of Plaintiff’s Motion for Preliminary Approval.

This supplemental brief addresses the items in the Court’s Tentative Ruling, issued on December 1, 2025, which states:

“The motion for preliminary approval is granted subject to the following:

1. At the hearing, be prepared to discuss whether the escalator clause has been triggered.
2. Paragraph 4.3 of the Settlement Agreement states the agreement will be funded within 30 days of the Effective Date (when the judgment is final). The Notice at section 3.1 states it will be funded 14 days after the judgment is final. Revise the documents to be consistent.
3. Paragraphs 1.40, 1.41, and 7.5.3 refer to paragraphs 6.2 and 6.3. The proper reference is to paragraph 5.2. Please revise.
4. Paragraph 7.5.4 refers to paragraph 6.4. The proper reference is paragraph 5.3. Please revise.”

Each of these items is addressed below in Section II.

The Amended Settlement Agreement with the Amended Class Notice attached thereto is attached as **Exhibit 1** to the concurrently filed Supplemental Declaration of George S. Azadian (“Azadian Sup. Decl.”). A redline showing the changes made by way of the Amended Settlement Agreement and the attached Amended Class Notice is attached as **Exhibit 2** to the Azadian Sup. Decl.

The revised [Proposed] Order is concurrently filed and also attached as **Exhibit 3** to the Azadian Sup. Decl. A redline showing the changes made by way to the revised [Proposed] Order is attached as **Exhibit 4** to the Azadian Sup. Decl.

Plaintiff has provided notice of the Court’s Order to the LWDA and the confirmation of filing with the LWDA is attached hereto as **Exhibit 5** to the Azadian Sup. Decl.

II. ISSUES RAISED BY THE COURT

Below, Plaintiffs address each of the issues raised by the Court in the Order:

1. “At the hearing, be prepared to discuss whether the escalator clause has been triggered.”

Response: Defendant has confirmed that the escalator clause has been triggered.

Defendant elected the option to shorten the Class Period to end on April 19, 2025, which is the date the escalator clause was triggered by reaching 87,586 Workweeks (the 79,624 Workweeks previously estimated by Defendant, plus the additional 10% of Workweeks needed to trigger the escalator clause). Due to this election, the Settlement Agreement and Class Notice were revised to reflect the Class Period ends on April 19, 2025, and to remove the escalator provision.

2. “Paragraph 4.3 of the Settlement Agreement states the agreement will be funded within 30 days of the Effective Date (when the judgment is final). The Notice at section 3.1 states it will be funded 14 days after the judgment is final. Revise the documents to be consistent.”

Response: The Class Notice has been revised to state that the Settlement will be funded within 30 days of the Effective Date. The Class Notice and Paragraph 4.3 of the Settlement Agreement are now consistent.

3. “Paragraphs 1.40, 1.41, and 7.5.3 refer to paragraphs 6.2 and 6.3. The proper reference is to paragraph 5.2. Please revise.”

Response: Paragraph 1.40 did not reference paragraphs 6.2 or 6.3. Paragraph 1.41 (the definition of “Released Class Claims”) has been corrected to reference paragraph 5.2 (Release by Participating Class Members Who Are Not Aggrieved Employees). Paragraph 1.42 (the definition of “Released PAGA Claims”) has been corrected to reference paragraph 5.3 (Release by Non-Participating Class Members Who Are Aggrieved Employees).

4. Paragraph 7.5.4 refers to paragraph 6.4. The proper reference is paragraph 5.3. Please revise.

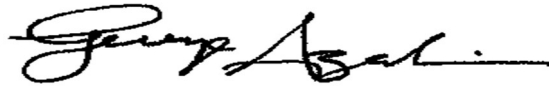
Response: Paragraph 7.5.4 has been corrected to reference paragraph 5.3.

III. CONCLUSION

All changes ordered by the Court have been completed. The Parties respectfully request that the Court enters the concurrently filed revised [Proposed] Order.

1 Dated: December 17, 2025

AZADIAN LAW GROUP, PC

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4 By: _____
5 George S. Azadian
6 Attorneys for Plaintiff,
7 JOSE RODRIGUEZ and the Proposed Class
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