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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

BLANCA E. BELLOSO, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

HYATT CORPORATION d.b.a. HYATT
REGENCY HUNTINGTON BEACH, a
California corporation; and DOES 1 through
100,
inclusive,

Defendants.

Case No. 30-2023-01355826-CU-OE-CXC

*[Assigned for all purposes to the Hon. David A.
Hoffer, Dept. CX103]*

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 27, 2026
Time: 1:30 p.m.
Dept.: CX103

Action Filed: October 11, 2023
Trial Date: None Set

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff Blanca E. Belloso (“Plaintiff”), individually and on behalf of a class of similarly situated
3 individuals, hereby submits this Supplemental Brief in Support of Plaintiff’s Motion for Final Approval
4 of Class Action Settlement (the “Motion”).

5 **I. PROCEDURAL HISTORY**

6 Plaintiff filed her Motion for Final Approval of Class Action Settlement on December 30, 2025,
7 with the hearing set for January 26, 2026.

8 On January 26, 2026, the Court issued a Minute Order detailing the issues that need to be
9 addressed in subsequent briefing. Consistent therewith, Plaintiff hereby submits the instant
10 supplemental brief (and accompanying declaration) to address the issues identified by the Court. Each
11 of the issues are addressed in the same order as they were identified by the Court in its Minute Order.

12 In connection with addressing the issues identified by the Court, the following documents are
13 being submitted concurrently herewith as an Exhibit to the Supplemental Declaration of Scott M.
14 Lidman (“Supp. Lidman Decl.”):

15 Attached as **Exhibit A** to the Supp. Lidman Decl. is a detailed hourly breakdown of Class
16 Counsel’s hours.

17 **II. ISSUES IDENTIFIED IN THE COURT’S JANUARY 26 MINUTE ORDER**

18 **A. Number of Aggrieved Employees**

19 In the Minute Order, the Court orders Plaintiff to explain the “change in the number of aggrieved
20 employees to 754” from the estimate of 621 stated at the preliminary approval stage.

21 The number of aggrieved employees stated at the preliminary approval stage was based on
22 Defendant’s estimate of aggrieved employees from the beginning of the relevant time period through
23 February 2024. Supp. Lidman Decl., ¶ 3. After the Class Data was delivered to the Settlement
24 Administrator and thoroughly reviewed, 754 individuals were identified as Aggrieved Employees. *Id.*
25 While there was an increase in the number of Aggrieved Employees, the increase has no major impact
26 on the Settlement Agreement as a whole. *Id.*
27
28

1 **B. Request for Attorneys' Fees**

2 In the Minute Order, the Court expresses its inclination to grant approval of an attorneys' fees
3 request of only 30% of the gross settlement amount, or \$49,500.00. Plaintiff respectfully requests an
4 attorneys' fee award of 33% of the gross settlement amount, or \$55,000.00.

5 All Parties agree to an attorneys' fee award of one-third (33%) of the gross settlement amount.
6 Supp. Lidman Decl., ¶ 4. This is exhibited in various documents, including the fully executed Settlement
7 Agreement. *Id.* Further, Class Counsel has spent well over two years litigating this lawsuit. *Id.* The
8 action was filed on October 11, 2023 in the instant court. *Id.* The lawsuit was removed to federal court
9 where Class Counsel prepared initial disclosures, drafted discovery requests, responded to discovery
10 requests, prepared Plaintiff for her deposition, deposed Defendant's person most qualified, called and
11 spoke to putative class members, and prepared a motion for class certification. *Id.* Class Counsel
12 prepared for and attended mediation and negotiated the Settlement Agreement. *Id.* The lawsuit was
13 remanded and since the execution of the Settlement Agreement, Class Counsel has had to continue to
14 spend considerable time on the matter, e.g., prepare preliminary approval papers, amendments to the
15 settlement agreement and a supplemental brief, communicate with the Settlement Administrator and
16 Class Members, and prepare final approval papers and the instant supplemental brief. *Id.* A detailed
17 hourly breakdown of Class Counsel's hours spent working on the case is attached to the Lidman Decl.
18 as Exhibit A. Further, no Class Member has objected to any part of the Settlement, including attorneys'
19 fees. Supp. Lidman Decl., ¶ 5.

20 An award of 33% of the gross settlement amount, or \$55,000.00, to compensate Class Counsel
21 for the time they have spent working on the matter is but only a small portion of the actual attorneys'
22 fees accrued. As such, an attorneys' fee award of 33% of the gross settlement amount is reasonable, fair,
23 and adequate.

24 **C. Attorneys' Fees Split**

25 In the Minute Order, the Court orders Plaintiff to identify the referring firm that is to receive a
26 portion of the attorneys' fees.

27 Haines Law Group, APC is to receive 46.5%, Lidman Law, APC is to receive 31%, and Michael
28 Burgis & Associates, PC is to receive 22.5% of the attorneys' fees award. Supp. Lidman Decl., ¶ 6.

1 **D. Plaintiff's Enhancement Award Request**

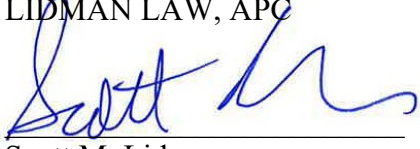
2 In the Minute Order, the Court orders expresses that an enhancement award of \$5,000 is
3 sufficient and proper. Plaintiff requests an enhancement award in the amount of \$10,000.

4 In addition to providing Class Counsel with substantial factual information and documents and
5 attending multiple conferences with Class Counsel to discuss the claims and theories at issue in
6 litigation, Plaintiff prepared and sat for a full day of deposition. Supp. Lidman Decl., ¶ 7. Plaintiff also
7 took on the stigma associated with being a named plaintiff in a public lawsuit against an employer. *Id.*
8 Plaintiff was aware that the lawsuit had the potential to affect future employment opportunities and
9 understood that she could be liable for Defendant's costs if she lost the case. *Id.* Nonetheless, Plaintiff
10 accepted the risks and pursued the lawsuit against her former employer, resulting in a settlement for the
11 Settlement Class. *Id.* Therefore, Plaintiff respectfully requests an enhancement award in the amount of
12 \$10,000.00.

13 **III. CONCLUSION**

14 For the foregoing reasons and the reasons discussed in Plaintiff's Motion, Plaintiff respectfully
15 requests that the Court approve the proposed Class Action and PAGA Settlement Agreement, including
16 the first and second amendments thereto, certify the Settlement Class, and enter the Proposed Order
17 and Final Judgment Granting Final Approval of Class Action Settlement.

18
19 Dated: April 3, 2026

20 Respectfully submitted,
21 LIDMAN LAW, APC
22 By: 
23 Scott M. Lidman

24 Attorneys for Plaintiff
25 BLANCA E. BELLOSO
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