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

FATIMA FLORES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

A.I. FOODS CORPORATION, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 22STCV27843

*[Assigned for all purposes to the Hon. Lawrence P.
Riff, Dept. SSC-7]*

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

Date: March 6, 2024
Time: 11:00 a.m.
Dept.: SSC-7

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

2 Plaintiff Fatima Flores (“Plaintiff”), individually and on behalf of a class of similarly situated
3 individuals, hereby submit this Supplemental Brief in Support of Plaintiff’s Motion for Preliminary
4 Approval of Class Action Settlement (the “Motion”).

5 **I. PROCEDURAL HISTORY**

6 Plaintiff filed her Motion for Preliminary Approval of Class Action Settlement on December
7 8, 2023, setting it for hearing on January 16, 2024.

8 On January 16, 2024, the Court issued a Tentative Ruling detailing the issues that need to be
9 addressed in subsequent briefing.

10 In connection with addressing the issues identified by the Court, the Parties have executed an
11 Addendum to the Class Action and PAGA Settlement Agreement and Class Notice and have modified
12 the Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval.
13 The following documents are being submitted concurrently herewith as Exhibits to the Supplemental
14 Declaration of Milan Moore (“Supp. Moore Decl.”), as follows:

15 Attached as **Exhibit A** to the Supp. Moore Decl. is the Addendum to the Class Action and
16 PAGA Settlement Agreement and Class Notice, with exhibit and executed by counsel.

17 Attached as **Exhibit B** to the Supp. Moore Decl. is the redlined version of the revised Court
18 Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval.

19 Attached as **Exhibit C** to the Supp. Moore Decl. is the final version of the revised Court
20 Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval.

21 **II. ISSUES IDENTIFIED IN THE COURT’S TENTATIVE RULING**

22 **A. First Amended Complaint**

23 The Tentative Ruling states: File the First Amended Complaint.

24 Plaintiff filed the First Amended Complaint on January 22, 2024. Moore Supp. Decl., ¶ 5.

25 **B. Limit the Releases to the Operative Complaint**

26 The Tentative Ruling states: Limit the releases to the operative complaint. The phrases “in the
27 Complaints in the Action” should instead refer to claims that were alleged, or reasonably could have
28 been alleged, based on the Class Period facts stated in the Operative Complaint.

The Parties have executed an Addendum with this change and mirrored the changes in the

1 proposed Class Notice. See Exhs. A-C to Supp. Moore Decl.

2 **C. Split of Attorneys' Fees**

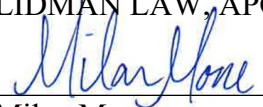
3 The Tentative Ruling states: Plaintiff has provided written approval of the split of attorneys'
4 fees in this action. (Nguyen Decl., ¶30) How will fees be apportioned.

5 Plaintiff has provided written approval of the split of attorneys' fees in this action. The split is
6 as follows: 45% to Haines Law Group, APC, 30% to Lidman Law, APC and 25% to The Dominguez
7 Firm. The Dominguez Firm is the referring attorney. Supp. Moore Decl., ¶ 6.

8 **III. CONCLUSION**

9 For the foregoing reasons and the reasons discussed in Plaintiff's Motion, Plaintiff respectfully
10 requests that the Court preliminarily approve the proposed Addendum to the Settlement, provisionally
11 certify the Settlement Class, and enter the Amended Proposed Order Granting Preliminary Approval of
12 Class Action Settlement submitted concurrently herewith.

13 Dated: February 8, 2024

14 Respectfully submitted,
15 LIDMAN LAW, APC
16 By: 
17 Milan Moore
18 Attorney for Plaintiff
19 FATIMA FLORES
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