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Attorneys for Plaintiffs Tyler Krug and Francisco Balbuena and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

TYLER KRUG & FERNANDO JARAMILLO,
individually, and on behalf of those similarly
situated and members of the general public; and
FRANCISCO BALBUENA, individually, and
on behalf of those similarly situated,

Plaintiffs,

vs.

EKC ENTERPRISES, INC., a California
Corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. BCV-23-103975

Honorable Bernard C. Barmann
Division H

**SUPPLEMENTAL DECLARATION OF
KAREN I. GOLD IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, ENHANCEMENT PAYMENTS, AND
SETTLEMENT ADMINISTRATION COSTS**

Date: November 18, 2025
Time: 8:30 a.m.
Dept.: H

Complaint Filed: November 28, 2023
FAC Filed: January 18, 2024
SAC Filed: February 20, 2025
Trial Date: Not Set

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1 **SUPPLEMENTAL DECLARATION OF KAREN I. GOLD**

2 I, Karen I. Gold, declare and state as follows:

3 1. I am an attorney duly licensed to practice law in all Courts of the State of California. I am
4 a member of Blackstone Law, APC, attorneys of record for Plaintiffs Tyler Krug and Francisco Balbuena.
5 I have personal knowledge of the facts contained herein, and if called to testify, I could and would
6 competently do so.

7 2. Pursuant to the Joint Stipulation of Class Action and PAGA Settlement (“Settlement” or
8 “Settlement Agreement”) entered into between Plaintiffs Tyler Krug, Francisco Balbuena, Fernando
9 Jaramillo (collectively, “Plaintiffs”) and Defendant EKC Enterprises, Inc. (“Defendant”) (collectively,
10 with Plaintiffs, the “Parties”), funding of the Gross Settlement Amount shall occur in the following
11 installments:

- 12 a. Half of the Gross Settlement Amount (i.e., \$750,000.00): No later than thirty (30) calendar
13 days after the Effective Date.
- 14 b. Remaining half of the Gross Settlement Amount (i.e., \$7,500,000.00): Four (4) equal but
15 separate payments on the following dates so the Gross Settlement Amount is fully funded
16 no later than November 12, 2026:
- 17 i. November 11, 2025;
18 ii. March 11, 2026;
19 iii. July 10, 2026; and
20 iv. November 11, 2026.

21 However, during the negotiations of the Settlement Agreement, the Parties did not expect
22 that the first of the four (4) equal payments would be due prior to final approval and prior to the deadline
23 for funding of the first half of the Gross Settlement Amount.

24 3. Accordingly, the Parties have met and conferred and agreed on the following funding
25 deadlines:

- 26 a. Half of the Gross Settlement Amount (i.e., \$750,000.00): No later than thirty (30) calendar
27 days after the Effective Date.

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b. Remaining half of the Gross Settlement Amount (i.e., \$750,000.00): On or before November 11, 2026.

4. The Notice of Class Action Settlement (“Class Notice”) advised the Class Members that their payments will be disbursed by the following:

a. Half of their payments: Within five (5) business days of the funding of the first half of the Gross Settlement Amount.

b. Remaining half of their payments: Within five (5) business days of the funding of the last deposit of the Gross Settlement Amount (November 11, 2026).

The deadlines for when Class Members are to be issued their payments do not change with the proposed funding schedule.

5. Concurrently with this filing is the [Proposed] Final Approval Order and Judgment that includes the proposed funding deadlines.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 5, 2025, at West Lake, California.



Karen I. Gold