

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
LIZETTE RODRIGUEZ (SBN 335182)
HAIG HOGDANIAN (SBN 334699)
JUSTICE LAW CORPORATION
751 N. Fair Oaks Avenue, Suite 101
Pasadena, California 91103
Telephone: (818) 230-7502
Facsimile: (818) 230-7259

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

MANOLSA CHARLES, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

NOVASYTE, LLC; a California limited
liability company; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 37-2022-00033748-CU-OE-CTL

Assigned for All Purposes to:
Honorable Katherine Bacal
Department C-69

CLASS ACTION

**SUPPLEMENTAL BRIEF IN SUPPORT
OF PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); and
[Proposed] Amended Order filed
concurrently herewith]

Hearing Date: October 4, 2024
Hearing Time: 1:30 p.m.
Hearing Place: Department C-69

Complaint Filed: August 22, 2022
FAC Filed: February 27, 2023
SAC Filed: November 29, 2023
Trial Date: None Set

Plaintiff Manolsa Charles (“Plaintiff”) provide this supplemental submission in response to the Court’s tentative ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on August 9, 2024. On August 8, 2024, the Court issued a tentative ruling denying the Motion for Preliminary Approval without prejudice and listing the reasons for the denial. At the Preliminary Approval Hearing, the Court agreed to continue the Preliminary Approval Hearing to October 4, 2024 at 1:30 p.m. to give the Parties time to draft and file the necessary supplemental documents addressing the issues set forth in the tentative ruling.

The chart below lists each of the Court’s issues and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) Scope of the Release.	The Settlement Agreement has been amended accordingly. (Supplemental Declaration of Douglas Han in Support of Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 3; Exhibit 2, §§ I(34), IV(G)(64).) The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 4; Exhibit 4, § 5.)
(2) Proposed Injunctive in the Proposed Order.	(See Proposed Amended Order Granting Motion for Preliminary Approval of Class Action Settlement filed concurrently herewith.)

Dated: September 11, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

**PROOF OF SERVICE
1013A(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Ave., Ste. 101 Pasadena, California 91103. My electronic service address is manderson@justicelawcorp.com

On October 2, 2024, I served the foregoing document described as

SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

for the following case: **Charles v. Novasyte, LLC.**
LWDA/Court Case No.: **LWDA Case No.: CM-991115-23**
Court Case No.: 37-2022-00033748-CU-OE-CTL
San Diego County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

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

Executed on October 2, 2024, at Pasadena, California.



Mariah Anderson