

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
WILLIAM WILKINSON (SBN 346777)
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 LOS ANGELES**

ALEJANDRO HARO, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

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

Defendants.

Case No.: 22STCV33431

Assigned for All Purposes to:
Honorable David S. Cunningham III
Department 11

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: September 25, 2024
Hearing Time: 10:00 a.m.
Hearing Place: Department 11

Complaint Filed: October 13, 2022
FAC Filed: February 5, 2024
Trial Date: None Set

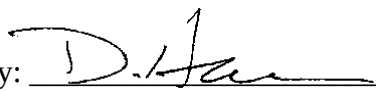
Plaintiff Alejandro Haro (“Plaintiff”) provide this supplemental submission in response to the Court’s ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on September 9, 2024 at 10:00 a.m. At the Preliminary Approval Hearing, the Court directed the Parties to modify the Class Period and PAGA Period to ensure that they had definitive end dates. The Court also continued the Preliminary Approval Hearing to September 25, 2024 at 10:00 a.m.

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

Ruling	Revisions/Submissions
(1) Class Period and PAGA Period.	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 1, §§ A(12), A(32), D(1).) The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 4; Exhibit 3, p. 1.)

Dated: September 18, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 Avenue, Suite 101, Pasadena, California 91103 and my electronic service address is manderson@justicelawcorp.com.

On September 18, 2024, I served the foregoing document described as

SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

for the following case: **Haro v. Armada Shipping LLC**
LWDA/Court Case No.: **LWDA Case No.: CM-999092-23**
 Court Case No.: 22STCV33431
 Los Angeles 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 September 18, 2024, at Pasadena, California.



Mariah Anderson