

**HAINES LAW GROUP, APC**  
Paul K. Haines (SBN 248226)  
phaines@haineslawgroup.com  
Fletcher W. Schmidt (SBN 286462)  
fschmidt@haineslawgroup.com  
Matthew K. Moen (SBN 305956)  
mmoen@haineslawgroup.com  
Aden M. Khachadorian (SBN 346908)  
akhachadorian@haineslawgroup.com  
2155 Campus Drive, Suite 180  
El Segundo, California 90245  
Tel: (424) 292-2350  
Fax: (424) 292-2355

**STONEBROOK LAW**  
Joseph Tojarieh (SBN 265492)  
10250 Constellation Boulevard, Suite 100  
Los Angeles, California 90067  
Tel: (310) 553-5533 | Fax: (310) 553-5536  
jft@stonebrooklaw.com

*Attorneys for Plaintiff*

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

GREGORY MEADE, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

PUMPKIN CITY'S PUMPKIN FARM INC., a  
California corporation; and DOES 1 through  
100,

Defendants.

Case No. 30-2024-01382083-CU-OE-CXC

*[Case 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 AND  
PAGA ACTION SETTLEMENT,  
ATTORNEYS' FEES AND COSTS, AND  
CLASS REPRESENTATIVE  
ENHANCEMENT AWARD**

Date: August 29, 2025  
Time: 10:00 a.m.  
Dept.: CX103

Action Filed: February 27, 2024  
Trial Date: None Set

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

2                   Plaintiff Gregory Meade (“Plaintiff”), hereby submits the following Supplemental Brief  
3 in Support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Action Settlement,  
4 Attorneys’ Fees and Costs, and Class Representative Enhancement Award in response to the  
5 questions posed by the Court in its June 20, 2025 Tentative Ruling continuing the hearing on  
6 Plaintiff’s Final Approval Motion (the “Tentative Ruling”). After reviewing the Tentative Ruling,  
7 Plaintiff and Defendant Pumpkin City’s Pumpkin Farm Inc. (“Defendant”) (collectively, the  
8 “Parties”) met and conferred regarding the issues raised by the Court, and address each item below  
9 following the same order in which the questions are posed in the Tentative Ruling:

10                   **(1)     Workweeks and Escalator Clause**

11                   *“The administrator should report the number of workweeks by class members and*  
12 *whether the escalator provision was triggered.”*

13                   Plaintiff is filing the Supplemental Declaration of Madely Nava of Apex Class Action,  
14 LLC (the “Nava Declaration”) concurrently with this Supplemental Brief. As reported therein,  
15 the total number of workweeks worked by the class members for the duration of the Class Period  
16 is 6,994 workweeks. *See* Nava Declaration, ¶ 4. As a result, the escalator provision of the Parties’  
17 settlement agreement was not triggered. *Id.*

18                   **(2)     Fee-Splitting Arrangement**

19                   *“What is the fee-splitting arrangement between counsel?”*

20                   The fee-splitting agreement between Haines Law Group, APC and Stonebrook Law is as  
21 follows: 67.5% to Haines Law Group, APC and 32.5% to Stonebrook Law. *See* Supplemental  
22 Declaration of Matthew K. Moen (“Moen Decl.”), ¶ 5. Plaintiff was fully notified of the fee-  
23 splitting agreement in writing and consented to the fee-splitting agreement in writing, in  
24 compliance with California Rules of Professional Conduct, Rule 1.5.1. *Id.*

25                   ///

26                   ///

27                   ///

1           **(3)     As to the Proposed Order**

2           (a) *“Remove counsel’s information as well as the hearing information from the caption*  
3 *page.”*

4           Concurrently herewith, Plaintiff has lodged an Amended [Proposed] Order Granting  
5 Plaintiff’s Motion for Final Approval of Class Action and PAGA Action Settlement, Attorneys’  
6 Fees and Costs, and Class Representative Enhancement Award, and Final Judgment (the  
7 “Amended [Proposed] Order and Judgment”). Pursuant to the Court’s Tentative Ruling, Plaintiff  
8 has removed counsel’s information and the hearing information from the caption page. *See* Moen  
9 Decl., ¶ 6, **Exhibit 1** (Amended [Proposed] Order and Judgment), **Exhibit 2** (redlined Amended  
10 [Proposed] Order and Judgment).

11           (b) *“The attorney fees and costs award should be specific as to the respective firms (¶*  
12 *12).”*

13           Plaintiff has revised Paragraph 12 of the Amended [Proposed] Order and Judgment to  
14 include specific award amounts for attorney fees and costs to the respective firms pursuant to the  
15 fee-splitting agreement between counsel. Specifically, the Amended [Proposed] Order and  
16 Judgment specifies that attorneys’ fees in the amount of \$67,500.00 shall be divided between  
17 counsel as follows: \$45,562.50 (equivalent to 67.5% of the total fee award) to Haines Law Group,  
18 APC) and \$21,937.50 (equivalent to 32.5% of the total fee award) to Stonebrook Law. *See* Moen  
19 Decl., ¶ 6, Exhibits 1 and 2. With respect to the award for costs, all litigation costs were incurred  
20 by Haines Law Group, APC, so the Amended [Proposed] Order and Judgment specifies that the  
21 award of litigation costs in the amount of \$7,806.57 (equivalent to 100% of the total cost award)  
22 shall go to Haines Law Group, APC. *See id.*

23           (c) *“The total attorney fees should not exceed 30% of the gross settlement amount, which*  
24 *the court finds fair, adequate and reasonable for a settlement of this size.”*

25           Plaintiff has revised Paragraph 12 of the Amended [Proposed] Order and Judgment to  
26 provide for a total attorney fees award of \$67,500.00, which is equivalent to 30% of the gross  
27 settlement amount in this matter. *See* Moen Decl., ¶ 6, Exhibits 1 and 2.

28       ///

1 Finally, concurrently with the filing of this Supplemental Brief, Plaintiff has submitted  
2 copies of this Supplemental Brief, all papers and declarations filed in support hereof, and the  
3 Amended [Proposed] Order and Judgment to the LWDA. *See* Moen Decl., ¶ 7, **Exhibit 3** (LWDA  
4 Submission); Proof of Service.

5  
6 Dated: August 19, 2025

Respectfully submitted,  
HAINES LAW GROUP, APC

7  
8 By:



Matthew K. Moen  
Attorneys for Plaintiff