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Attorneys for Plaintiff KARINA A. SANTOYO,
as an individual and on behalf of all employees similarly situated

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

KARINA A. SANTOYO, as an individual
and on behalf of all employees similarly
situated,

Plaintiff,

v.

A P R CONSULTING, INC., a California
Corporation; LIBERTY UTILITIES (PARK
WATER) CORP., a California Corporation;
LIBERTY UTILITIES (APPLE VALLEY
RANCHOS WATER) CORP., a California
Corporation; LIBERTY UTILITIES
(CALPECO ELECTRIC) LLC, a California
LLC; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV04117

[Assigned for all purposes to Hon. Carolyn B. Kuhl,
Dept. 12]

**SPPLEMENTAL DECLARATION OF LILIT
TUNYAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
PURSUANT TO THE PRIVATE
ATTORNEY GENERAL'S ACT OF 2004**

Date: May 29, 2025
Time: 10:30 a.m.
Courtroom: Dept. 12
Judge: Hon. Carolyn B. Kuhl

Action Filed: February 20, 2024
Trial Date: Not Set

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1. I am admitted, in good standing, to practice as an attorney in the State of California, the United States District Courts for the Central, Eastern, Southern and Northern Districts of California. I am the founding partner at the law firm of Tunyan Law, APC. I am a fully qualified, adult resident of the State of California, and, if called as a witness herein, I would testify truthfully to the matters set forth herein. All of the matters set forth herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true. I am one of the attorneys of record for Plaintiff KARINA A. SANTOYO (“Plaintiff”).

3. The Parties reached a resolution of Plaintiffs' PAGA claims premised on 12,073 pay periods between February 19, 2023 and November 19, 2024 with the PAGA release period of February 19, 2023 through February 7, 2025 or the date of entry of order for approval of the Settlement, whichever is earlier with an escalator clause that would be triggered should pay periods exceed 12,073 by more than 10%.

5. On or about May 23, 2025, Defendants' counsel represented and provided a declaration stating that the total number of pay periods worked by Aggrieved Employees through Liberty Defendants and staffing agencies between February 19, 2023 and May 29, 2025 is 9,675.

6. Plaintiff's counsel considered the newly obtained information from Defendants and believe

1 that if PAGA period is extended from February 7, 2025 to May 29, 2025, the Aggrieved Employees will
2 not be prejudiced as the number of pay periods is still significantly below the threshold of 12,073 pay
3 periods or triggering the escalator clause.

4 EXHIBIT

5 7. A copy of this Supplemental Declaration, Defendant's counsel's supplemental declaration in
6 support of approval motion as well as Amended Proposed Order and Amended Proposed Judgment were
7 submitted to the LWDA prior to this declaration filing. That submission is attached hereto as **Exhibit**
8 **"1."**

9
10 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
11 true and correct. Executed this 23rd day of May 2025, at Glendale, California.

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15 _____
LILIT TUNYAN, "Declarant"

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Exhibit “A”

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES

On the date indicated below, I served the document described as: **SUPPLEMENTAL DECLARATION OF LILIT TUNYAN IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEY GENERAL'S ACT OF 2004** on the interested parties in this action by sending a true copy thereof to interested parties as follows and as stated on the attached service list:

[✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**. I did not receive an error message.

Lilit Tunyan

Frank