

DOUGLAS HAN (SBN 232858)
SHUNT TATAVOS-GHARAJEH (SBN 272164)
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 Plaintiffs

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

CHRISTINA NANCE, individually and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

YOUNG MEN’S CHRISTIAN
ASSOCIATION OF THE EAST BAY DBA
YMCA OF THE EAST BAY, a California
nonprofit corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 23CV040009

Assigned for All Purposes to:
Honorable Noël Wise
Department 21

CLASS ACTION

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

[Res ID: 119012569541]

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

Hearing Date: December 10, 2024
Hearing Time: 1:30 p.m.
Hearing Place: Department 21

Complaint Filed: August 4, 2023
FAC Filed: April 29, 2024
Trial Date: None Set

Plaintiffs Christina Nance and Dereka Williams (“Plaintiffs”) provide this supplemental submission in response to the Court’s tentative ruling regarding the Motion for Preliminary Approval originally scheduled for October 8, 2024 at 1:30 p.m. The tentative ruling also continued the Preliminary Approval Hearing to December 10, 2024 at 1:30 p.m. to give the Parties time to modify the settlement documents.

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

Ruling	Revisions/Submissions
(1) The Scope of the PAGA Released Claims.	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.”), ¶ 4; Exhibit 2, ¶ 27.) The Class Notice was modified accordingly. (Supp. Han Decl., <i>supra</i>, at ¶ 5; Exhibit 4, § 8.)

Dated: October 22, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiffs

**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 address is manderson@justicelawcorp.com.

On October 22, 2024, I served the foregoing document described as

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

for the following case: **Nance, et al. v. Young Men's Christian Association of the East
Bay dba YMCA of the East Bay**
LWDA/Court Case No.: **LWDA Case No.: CM-1017849-24**
Court Case No.: 23CV040009
Alameda 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 22, 2024, at Pasadena, California.



Mariah Anderson