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*Attorneys for Plaintiffs*

**RUTAN & TUCKER, LLP**  
Maria Z. Stearns (State Bar No. 230649)  
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18575 Jamboree Road, 9th Floor  
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*Attorneys for Defendant*

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

GERARDO ALEXANDER ORTEGA,  
individually, and on behalf of other  
members of the general public similarly  
situated;

Plaintiff,

v.

SNOOZE HIC LLC, a Colorado limited  
liability company; SNOOZE IMPORT  
EXPORT LLC, a Colorado limited liability  
company; SNOOZETOWN LLC, a  
Delaware limited liability company;  
SNOOZETROPOLIS LLC, a Delaware  
limited liability company; and DOES 1  
through 100, inclusive;

Defendants.

Case No.: 30-2024-01392708-CU-OE-CXC

Assigned for All Purposes to:  
Honorable David A. Hoffer  
Department CX-103

**AMENDMENT TO THE SETTLEMENT  
AGREEMENT**

|                  |                |
|------------------|----------------|
| Complaint Filed: | April 10, 2024 |
| FAC Filed:       | August 9, 2024 |
| SAC Filed:       | August 7, 2025 |
| Trial Date:      | None Set       |

1 This Amendment to the Settlement Agreement is entered into by Plaintiffs Gerardo  
2 Alexander Ortega and Hunter Howells (“Plaintiffs”) on their own behalf and on behalf of all  
3 members of the Settlement Group on the one hand and Defendant Snoozetown LLC  
4 (“Defendant”) on the other.

### 5 RECITALS

6 1. On August 12, 2025, the Parties fully executed the Settlement Agreement  
7 (“Settlement Agreement”) representing the long-form agreement submitted to the Court for  
8 approval.

9 2. On August 26, 2025, Plaintiffs submitted the Settlement Agreement to the Court  
10 for approval that was set for hearing on November 3, 2025.

11 3. On October 31, 2025, the Court issued a tentative ruling ordering the Parties to  
12 modify portions of the Settlement Agreement (and exhibits) and continued the Private Attorneys  
13 General Act of 2024 (“PAGA”) Approval Hearing to February 9, 2026.

14 4. Thereafter, the Parties met and conferred and agreed to modify, via this  
15 Amendment, certain portions of the Settlement Agreement (and exhibits) consistent with the  
16 Court’s order.

### 17 STIPULATION

18 The Parties agree via this Amendment to amend the Settlement Agreement pursuant to  
19 the Court’s October 31, 2025 tentative ruling, as follows:

20 **1. Section K has been added to the Recitals and is to read as follows:**

21 “Plaintiffs’ Counsel” means Douglas Han and Shunt Tatavos-Gharajeh of Justice  
22 Law Corporation.

23 **2. Section 7(b)(i)(A) previously read as follows:**

24 Plaintiffs’ Counsel may submit an application to the Court for the Attorneys’ Fees Award  
25 not to exceed \$81,666.67 (1/3 of the Gross Settlement Amount). Defendant will not oppose or  
26 object to this application. Defendant shall have no liability for attorneys’ fees except as provided  
27 for in this Agreement.

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**Section 7(b)(i)(A) shall now read as follows:**

Plaintiffs' Counsel may submit an application to the Court for the Attorneys' Fees Award not to exceed \$73,500 (30% of the Gross Settlement Amount). Defendant will not oppose or object to this application. Defendant shall have no liability for attorneys' fees except as provided for in this Agreement.

Except as set forth expressly above, the Settlement Agreement shall remain unchanged.

IN WITNESS THEREOF, the Parties acknowledge that they have read the Amendment,  
and knowingly and voluntarily agree to all its terms, by affixing their signatures below.

Dated: \_\_\_\_\_

**GERARDO ALEXANDER ORTEGA**

\_\_\_\_\_

Dated: \_\_\_\_\_

**HUNTER HOWELLS**

\_\_\_\_\_

Dated: December 23, 2025

**SNOOZETOWN LLC**

DocuSigned by:  
*Brianna Borin*

Name: Brianna Borin

Title: Chief People and Culture Officer

**APPROVED AS TO FORM:**

Dated: \_\_\_\_\_

**JUSTICE LAW CORPORATION**

\_\_\_\_\_  
Douglas Han, Esq.  
Shunt Tatavos-Gharajeh, Esq.  
*Attorneys for Plaintiffs*

Dated: December 29, 2025

**RUTAN & TUCKER, LLP**

*Kimberly Nayagam*

\_\_\_\_\_  
Maria Z. Stearns, Esq.  
Kimberly A. Nayagam, Esq.  
*Attorneys for Defendant*

1 IN WITNESS THEREOF, the Parties acknowledge that they have read the Amendment,  
2 and knowingly and voluntarily agree to all its terms, by affixing their signatures below.

3  
4 Dated: 12/26/2025 \_\_\_\_\_

**GERARDO ALEXANDER ORTEGA**



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7 Dated: \_\_\_\_\_

**HUNTER HOWELLS**

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9 Dated: \_\_\_\_\_

**SNOOZETOWN LLC**

10  
11 \_\_\_\_\_  
Name:

12 Title:

13 **APPROVED AS TO FORM:**

14 Dated: \_\_\_\_\_

**JUSTICE LAW CORPORATION**

15  
16 \_\_\_\_\_  
Douglas Han, Esq.

17 Shunt Tatavos-Gharajeh, Esq.

18 *Attorneys for Plaintiffs*

19 Dated: \_\_\_\_\_

**RUTAN & TUCKER, LLP**

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21 \_\_\_\_\_  
Maria Z. Stearns, Esq.

22 Kimberly A. Nayagam, Esq.

23 *Attorneys for Defendant*  
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1 IN WITNESS THEREOF, the Parties acknowledge that they have read the Amendment,  
2 and knowingly and voluntarily agree to all its terms, by affixing their signatures below.

3  
4 Dated: \_\_\_\_\_

**GERARDO ALEXANDER ORTEGA**

5 \_\_\_\_\_

6 Dated: 12/27/2025

**HUNTER HOWELLS**

7 *Hunter Howells*  
8 \_\_\_\_\_

9 Dated: \_\_\_\_\_

**SNOOZETOWN LLC**

10 \_\_\_\_\_  
11 Name:

12 Title:

13 **APPROVED AS TO FORM:**

14 Dated: 12/29/25

**JUSTICE LAW CORPORATION**

15 *D. Han*  
16 \_\_\_\_\_

Douglas Han, Esq.

17 Shunt Tatavos-Gharajeh, Esq.

18 *Attorneys for Plaintiffs*

19 Dated: \_\_\_\_\_

**RUTAN & TUCKER, LLP**

20 \_\_\_\_\_  
21 Maria Z. Stearns, Esq.

22 Kimberly A. Nayagam, Esq.

23 *Attorneys for Defendant*  
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**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 nalonsoesteban@justicelawcorp.com

On January 15, 2026, I served the foregoing document described as

**AMENDMENT TO THE SETTLEMENT AGREEMENT**

for the following case: **Gerardo Alexander Ortega v. Snooze HIC LLC, et al.**  
LWDA/Court Case No.: **LWDA Case No.: CM-1028095-24**  
**Case No.: 30-2024-01392708-CU-OE-CXC**  
**Orange 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**

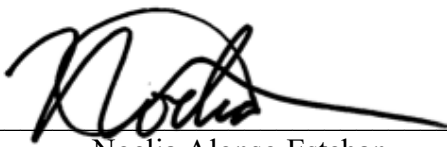
**[X] BY ELECTRONIC SUBMISSION**

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 January 15, 2026, at Pasadena, California.

  
Noelia Alonso Esteban