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Attorneys for Plaintiff Norma Melara

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

NORMA MELARA, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

FOUNDATION FOR EARLY
CHILDHOOD EDUCATION, a California
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 24STCV21314

*[Assigned for all purposes to the Hon. Timothy
Patrick Dillon Dept. 15]*

REPRESENTATIVE ACTION

**SUPPLEMENTAL DECLARATION OF KANE
MOON IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

[Filed with the Declaration of Kevin Lee,
[Proposed] Order, and [Proposed Judgment]

Action filed: August 20, 2024
FAC filed: November 1, 2024
Trial date: Not set

DECLARATION OF KANE MOON

I, KANE MOON, declare as follows:

1. I am an attorney at law duly licensed to practice as such before all the Courts of the State of California and am one of the attorneys of record for Plaintiff Norma Melara (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and if called as a witness, I could and would testify competently to them under oath.

2. This supplemental declaration is submitted in support of Plaintiff’s Motion for Approval of PAGA Settlement

3. On April 21, 2026, the Court issued a Minute Order requesting the parties to submit amended papers, including an amended proposed order and judgment.

4. Following the Court’s order, counsel for Defendant Foundation for Early Childhood Education (“Defendant”) (together with Plaintiff, the “Parties”), provided the proposed Settlement Administrator with data for the PAGA Employees. (Declaration of Kevin Lee, ¶ 4.) Based on a review of the data, the Settlement Administrator determined there are a total of 7,709 pay periods in the original PAGA period. (*Id.*) Accordingly, Defendant elected to end the PAGA Period on February 15, 2026, such that there are 7,508 PAGA Pay Periods. (*Id.* at ¶ 6.)

5. The Parties revised the PAGA Period to August 18, 2023 to February 15, 2026, as reflected in the Private Attorneys General Act Amended Settlement Agreement and Release (the “Settlement”). A true and correct copy of the fully executed Settlement is attached hereto as **Exhibit 1**. A true and correct copy of the redlined version of the Settlement showing the changes made from the original settlement is attached hereto as **Exhibit 2**. Plaintiff submitted the Settlement to the California Labor and Workforce Development Agency (the “LWDA”). A true and correct copy of the submission confirmation email from the LWDA is attached hereto as **Exhibit 3**.

6. An amended [Proposed] Order and an amended [Proposed] Judgment reflecting the updated PAGA Period are filed concurrently herewith. A true and correct copy of the redline of the [Proposed] Order showing the changes made is attached hereto as **Exhibit 4**. A true and correct copy of the redline of the [Proposed] Judgment showing the changes made is attached hereto as **Exhibit 5**.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
2 and correct. Executed on May 8, 2026, at Los Angeles, California.

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Kane Moon
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