

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 Plaintiff

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

G. TONI BARNES, individually, and on behalf
of other members of the general public similarly
situated;

Plaintiff,

v.

GRGICH HILLS CELLAR, a California
corporation; and DOES 1 through 100,
inclusive;

Defendants.

Case No.: 24CV001786

Assigned for All Purposes to:
Honorable Cynthia P. Smith
Department A

CLASS ACTION

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

[Supplemental Declaration of Proposed Class
Counsel (Douglas Han); Declaration of
Proposed Class Representative (G. Toni
Barnes) and [Proposed] Amended Order filed
concurrently herewith]

Hearing Date: October 15, 2025
Hearing Time: 8:30 a.m.
Hearing Place: Department A

Complaint Filed: October 11, 2024
Trial Date: None Set

Plaintiff G. Toni Barnes (“Plaintiff”) provide this supplemental submission in response to the Court’s tentative ruling and Minute Order on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on July 30, 2025. On July 29, 2025, the Court issued a tentative ruling instructing Plaintiff and Defendant Grgich Hills Cellar (“Defendant”) to make changes to the settlement documents that were submitted alongside the Motion for Preliminary Approval of Class Action Settlement and to provide further briefing in other issues. The Parties appeared at the Motion for Preliminary Approval Hearing originally scheduled on July 30, 2025, to address the issues set forth in the tentative ruling. The Court issued a Minute Order continuing the Motion for Preliminary Approval Hearing and instructing the Parties to submit supplemental documents.

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

Ruling	Revisions/Submissions
(1) Response Deadline.	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.”), ¶ 6; Exhibit 3, <i>supra</i> , at § A(42).)
(2) Translation of the Class Notice, and All Other Materials to be Distributed to the Class Members.	(Supp. Han Decl., <i>supra</i> , at ¶ 7; Exhibit 3, <i>supra</i> , at § A(11).)
(3) Reasonability of the Class Representative Service Payment	(See Declaration of G. Toni Barnes filed concurrently herewith.) (Supp. Han Decl., <i>supra</i> , at ¶ 8.)
(4) Reversion of the Gross Settlement Amount	(Supp. Han Decl., <i>supra</i> , at ¶ 9; Exhibit 3,

(or any Amount to Defendant).	<i>supra</i> , at § C(1).)
(5) Cy Pres Recipient.	(Supp. Han Decl., <i>supra</i> , at ¶ 10; Exhibit 3, <i>supra</i> , at § D(3)(c).)
(6) Section 1542 Release.	(Supp. Han Decl., <i>supra</i> , at ¶ 11; Exhibit 3, <i>supra</i> , at §§ E(1)-E(3).)
(7) Notice of Final Judgment.	(Supp. Han Decl., <i>supra</i> , at ¶ 12; Exhibit 3, <i>supra</i> , at § G(8)(a).)
(8) Agreement for the Payment of the Class Counsel Fees Payment.	(Supp. Han Decl., <i>supra</i> , at ¶ 13.)
(9) A proposed schedule, with dates included, for class notice, objection, opt-out, motion for final approval and attorney's fees, final accounting and, if applicable, a Final Distribution of Residual Funds.	(See Proposed Amended Order filed concurrently herewith.) (Supp. Han Decl., <i>supra</i> , at ¶ 14.)

Dated: September 18, 2025

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorneys for Plaintiff

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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

for the following case: LWDA/Court Case No.:	G. Toni Barnes v. Grgich Hills Cellar LWDA Case No.: CM-1044048-24 Case No.: 24CV001786 Napa County Superior Court
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**State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814**

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.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Kochia

PROOF OF SERVICE