

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
Tiara Gose-Hardy (SBN 323823)
tgose@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
IGNACIO RIOS

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
IGNACIO RIOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY

IGNACIO RIOS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

COMMUNITY TREE SERVICE, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Lead Case No.: 24CV003969
Consolidated with Case No. 24CV005091

*[Assigned for All Purposes to Hon. Ian A.
Rivamonte, Dept 14]*

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff Ignacio Rios (“Plaintiff”), individually and on behalf of a class of similarly situated
3 individuals, hereby submits this Supplemental Brief in Support of Plaintiff’s Motion for Preliminary
4 Approval of Class Action Settlement (the “Motion”).

5 **I. PROCEDURAL HISTORY**

6 Plaintiff filed his Motion for Preliminary Approval of Class Action Settlement on June 24, 2026,
7 with the hearing being held on July 24, 2026.

8 On July 24, 2026, the Court issued an Order granting Plaintiff’s unopposed motion for
9 preliminary approval of class action and PAGA settlement subject to an issue that needs to be addressed
10 in subsequent briefing. Consistent therewith, Plaintiff hereby submits the instant supplemental brief
11 (and accompanying declaration) to address the issue identified by the Court.

12 In connection with addressing the issue identified by the Court, Plaintiff and Defendant
13 Community Tree Service, LLC (collectively, the “Parties”) have executed an Amended Class Action
14 and PAGA Settlement Agreement and Release. The following documents are being submitted
15 concurrently herewith as Exhibits to the Supplemental Declaration of Tiara Gose-Hardy (“Supp. Gose-
16 Hardy Decl.”), as follows:

17 Attached as **Exhibit A** to the Supp. Gose-Hardy Decl. is the redlined version of the revised Class
18 Action and PAGA Settlement Agreement and Release.

19 Attached as **Exhibit B** to the Supp. Gose-Hardy Decl. is the Amended Class Action and PAGA
20 Settlement Agreement, executed by the Parties.

21 Attached as **Exhibit C** to the Supp. Gose-Hardy Decl. is a Spanish translation of the Class
22 Notice.

23 **II. ISSUE IDENTIFIED IN THE COURT’S JULY 24, 2026 ORDER**

24 **A. Language of Class Notice**

25 In the Order, the Court orders Plaintiff to clarify whether the Class Notice to be mailed to Class
26 Members will include a Spanish translation.

27 The Class Notice to be mailed to Class Members will include a Spanish translation. Supp. Gose-
28 Hardy Decl., ¶ 5. The Parties have executed an Amended Class Action and PAGA Settlement
Agreement and Release making clear that the Class Notice will be mailed to Class Members in both

English and Spanish. *See* Supp. Gose-Hardy Decl., Exh. B. A Spanish version of the Class Notice is attached to the Supp. Gose-Hardy Decl. as Exhibit C. The requested Administration Expenses Payment will not increase as a result of the translation, as the original bid provided by the Settlement Administrator includes the cost of a translation. Supp. Gose-Hardy Decl., ¶ 6; *see* Declaration of Jodey Lawrence of Phoenix Settlement Administrators in Support of Motion for Preliminary Approval of Class Action Settlement, Exh. B.

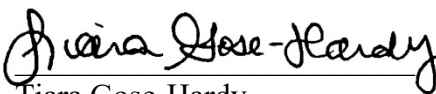
Plaintiff will provide the LWDA with a copy of this Supplemental Brief and the Amended Class Action and PAGA Settlement Agreement and Release after the instant brief is filed with the Court. Supp. Gose-Hardy Decl., ¶ 7. A proof of service will be filed with the Court. *Id.*

III. CONCLUSION

For the foregoing reason and the reasons discussed in Plaintiff's Motion, Plaintiff respectfully requests that the Court preliminarily approve the proposed Amended Class Action and PAGA Settlement Agreement and Release, provisionally certify the Settlement Class, and enter the Proposed Order Granting Preliminary Approval of Class Action Settlement previously submitted to the Court.

Dated: August 24, 2026

Respectfully submitted,
LIDMAN LAW, APC

By: 
Tiara Gose-Hardy

Attorneys for Plaintiff
IGNACIO RIOS