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Attorneys for Plaintiff MARIA FELIX GONZALEZ,
on behalf of herself, the State of California, and all other aggrieved employees

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Attorneys for Defendant INNOVATIVE INTEGRATED HEALTH, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

MARIA FELIX GONZALEZ, individually,
and on behalf of all other similarly situated,

Plaintiff,

vs.

INNOVATIVE INTEGRATED HEALTH,
INC., a California corporation; and DOES 1
through 10, inclusive,

Defendants.

CASE NO.: 30-2021-01221176-CU-OE-CXC

ASSIGNED FOR ALL PURPOSES TO:
HON. RANDALL J. SHERMAN
DEPARTMENT NO. CX105

**AMENDMENT TO PAGA SETTLEMENT
AGREEMENT**

Complaint Filed: September 13, 2021
Trial Date: None Set

AMENDMENT TO PAGA SETTLEMENT AGREEMENT

I. INTRODUCTION

The parties agree that the below sections shall be struck from the PAGA Settlement Agreement and replaced with alternative language in accordance with the Court's tentative order.

II. AMENDMENTS

A. Definitions

1. Strike the language of "'Covered Period' means the period of time from September 13, 2020 through approval of the Settlement" and replace with the language of "'Covered Period' means the period of time from September 13, 2020 through July 15, 2023."

B. Section III(F)

1. Strike the language of "one hundred sixteen thousand six hundred and sixty six dollars and sixty six cents (\$116,666.66)," and replace with the language of "one hundred eleven thousand six hundred and fifty five dollars and fifty cents (\$111,655.50)."

C. Section III(G)

1. Strike the language of "If the total number of pay periods worked by the PAGA Group during the Covered Period exceeds 28,052 (i.e., ten percent above the 25,501 pay periods that Defendant reported prior to or during the mediation), the Settlement Amount shall increase in proportion to the increase above ten percent. In other words, an 11 percent increase in pay periods will result in a 1 percent increase in the Settlement Amount, or Defendant may choose to limit the release period to whenever the number of pay periods during the PAGA Period reaches 28,052" and replace with the language of "The Covered Period totals 28,052 pay periods, beginning on September 13, 2020 and ending on July 15, 2023."

D. Section III(J)

1. Strike the language of “any and all claims based on the Private Attorneys General Act (2004), arising during the Covered Period,” and replace with the language of “the PAGA Released Claims.”

III. EXECUTION BY PARTIES

The Parties hereby execute the Amendment to the PAGA Settlement Agreement.

Dated: April 23, 2024

MARIA FELIX GONZALEZ

DocuSigned by:

Maria Felix Gonzalez

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Plaintiff

Dated: April ____, 2024

INNOVATIVE INTEGRATED HEALTH, INC.

By: _____

Daniel Longoria

CEO of Innovative Integrated Health, Inc.

APPROVED AS TO FORM:

Dated: April 23, 2024

MOON LAW GROUP, PC

DocuSigned by:

Kane Moon

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By: _____

Kane Moon

Lilit Ter-Astvatsatryan

Attorneys for Plaintiff MARIA FELIX
GONZALEZ

Dated: April ____, 2024

BERGER KAHN, A Law Corporation

By: _____

Steven H. Gentry, Esq.

Erin R. Ezra, Esq.

Jamie L. Rice, Esq

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Dated: April ____, 2024

MARIA FELIX GONZALEZ

Plaintiff

Dated: April 23, 2024

INNOVATIVE INTEGRATED HEALTH, INC.

By: *Daniel A. Longoria*
Daniel A. Longoria (Apr 23, 2024 11:13 PDT)

Daniel Longoria
CEO of Innovative Integrated Health, Inc.

APPROVED AS TO FORM:

Dated: April ____, 2024

MOON LAW GROUP, PC

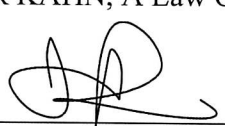
By: _____

Kane Moon
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Attorneys for Plaintiff MARIA FELIX
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Dated: April 23, 2024

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