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Attorneys for Plaintiff Jade Ball, Individually and
on behalf of all others similarly situated

*Additional Counsel for Plaintiff, and Counsel
of Record for Defendant on the Following Page*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Sharon Britt, Andre Wall, Joshua
Blalock, and Jade Ball, individually and
on behalf of all others similarly situated,

Plaintiffs,

vs.

Southern California Edison Company;

Defendant.

Case No.: 2:20-cv-08023-FMO (ASx)

Hon. Fernando M. Olguin

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

**[filed concurrently with Declaration
of Neil M. Larsen]**

Action Filed: September 2, 2020

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Co-Counsel for Plaintiff

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2 Plaintiff Jade Ball (“Plaintiff”) submits this supplemental brief in response to
3 the Court’s January 20, 2022 Order, in which the Court ordered Plaintiff to file a
4 supplemental declaration and exhibits, including a revised Settlement Agreement.
5 The Parties have met and conferred and have amended the Settlement Agreement
6 and Class Notice, drafted a Request for Exclusion Form, drafted an FLSA Opt-In
7 Form, and have addressed the Court’s requirement for a further analysis regarding
8 the potential class recovery for each of the claims subject to the Settlement.

9 **I. Revised Settlement Agreement and Notice Documents**

10 A redlined version of amended Settlement Agreement, reflecting the changes
11 made to the original Settlement Agreement, is attached to the concurrently-filed
12 Declaration of Neil M. Larsen (“Larsen Decl.”) as **Exhibit 1**. A redlined version of
13 the amended Class Notice, reflecting the changes made to the original Class Notice,
14 is attached to the Larsen Decl. as **Exhibit 2**. The fully-executed, amended
15 Settlement Agreement is attached to the Larsen Decl. as **Exhibit 3**. The Request
16 for Exclusion form is attached to the Larsen Decl. as **Exhibit 4**. Finally, the FLSA
17 Opt-In form is attached to the Larsen Decl. as **Exhibit 5**.

18 **II. Plaintiff’s Supplemental Damages Analysis**

19 The Court requested that Plaintiff provide an analysis of the potential class
20 recovery for each of the claims subject to the Settlement. Plaintiff has provided that
21 analysis in the concurrently filed declaration of Neil M. Larsen. *See* Larsen Decl.
22 ¶¶ 7-14.

23 **III. Fair Labor Standards Act (“FLSA”) Claims**

24 The Court at the Preliminary Approval Hearing directed the Parties to
25 include an FLSA Opt-In Form. The Parties have done so. The Parties have also
26 agreed to allocate \$200,000 (approximately 11% of the Net Settlement Amount)
27 as the “FLSA Settlement Amount” to be paid to all eligible Settlement Class
28 members (i.e., those Settlement Class members who worked for Defendant during

1 the FLSA Period, which is September 2, 2017 to November 23, 2021) who opt-in
2 to the FLSA claim by timely submitting a completed FLSA Opt-In
3 Form. Payments to from the FLSA Amount shall be determined *pro rata* based on
4 the number of workweeks worked by each eligible Settlement Class member
5 during the FLSA Period.

6 **CONCLUSION**

7 Based on the above, Plaintiff respectfully submits that the Parties have
8 addressed the Court's concerns, and respectfully requests that the Court sign the
9 Amended [Proposed] Order Granting Preliminary Approval of Class Action
10 Settlement, filed concurrently herewith.

11 DATED: March 14, 2022

HAINES LAW GROUP, APC

12 By: /s/ Neil M. Larsen

13 Paul K. Haines

14 Tuvia Korobkin

15 Neil M. Larsen

16 Attorneys for Plaintiff
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