

requests for exclusion is dated September 29, 2025. Why was this exclusion not disclosed and provided to the court in connection with the settlement administrator's prior declaration? Also, why has the number of mailed notices increased from 176 to 192?

2. In the November 6, 2025 order, the court stated that Lawyers for Justice must submit contemporaneous time records reflecting the timekeeper, date of work, task, and time spent on each task. The "Attorney Task and Time Chart" attached as Exhibit B to the Supplemental St. John Declaration (ROA 358) is insufficient; each time entry must be separately identified. Grouping work performed over multiple days and months is insufficient. In addition, how does the JCCP matter referred to in the "Attorney Task and Time Chart" relate to this case?

3. In the November 6, 2025 order, the court stated that Blumenthal Nordrehaug Bhowmik De Blouw LLP should explain what DM&A is and the work it performed for this case. Plaintiff's counsel states that "Eric R. Lietzow from Desmond, Marcell & Amster (DM&A) performed expert work on this matter for Plaintiffs. Ultimately, he prepared a declaration which was filed in the *Shachno* Action." Supp. Nordrehaug Decl. (ROA 354) ¶ 10. Plaintiff's counsel attaches five DM&A invoices to his declaration, three of which post-date the invoice for "Declaration Preparation." Supp. Nordrehaug Decl. Ex. 2. Plaintiff's counsel should submit a copy of the declaration Lietzow filed in the *Shachno* case to this court, and should generally explain the type of expert work Lietzow performed and why it was reasonably necessary for the case. In addition, plaintiff's counsel should whether the \$40,946.44 in costs referred to in paragraph 12 of the Supplemental Nordrehaug Declaration includes costs for overhead items such as meals, parking, postage and legal research, which the court stated in the November 6, 2025 order (ROA 344, Item No. 7) should be removed.

4. In the November 6, 2025 order, the court stated that in its June 4, 2025 order the court had approved not-to-exceed settlement administration costs of \$25,000 (ROA 311 (¶ 2)) and that the court's May 22, 2025 order also states the not-to-exceed settlement administration costs are \$25,000 (ROA 301), but that the notice sent to the class members and aggrieved employees stated that the not-to-exceed settlement administration costs are \$29,950. Polites Decl. (ROA 327) ¶ & Ex. A (at 2). The court asked why the settlement administrator distributed a notice that is inconsistent with the court's orders, and how the parties propose to address this issue. Plaintiff's counsel's explanation and proposal in his supplemental declaration (Supp. Nordrehaug Decl. (ROA 354) ¶ 15) is satisfactory.

5. In the November 6, 2025 order, the court asked whether, since the filing of the prior declarations, the parties (plaintiffs and defendant) have become aware of any class, representative or other collective action in any other court that asserts claims similar to those asserted in this case. The court stated that if any such actions are known to exist, the declaration(s) shall state the name and case number of any such case and the procedural status of that case, and describe the impact of the settlement on that case.

Defendant's counsel has submitted a declaration (ROA 360) in which he identifies eight class, representative or other collective actions that he states assert claims similar to those asserted in this case. Vartanian Decl. (ROA 360) ¶¶ 3-4. Seven of the eight cases were filed before plaintiffs filed the motion for final approval of the settlement in this case on October 13, 2025, yet, despite a hearing on the motion on November 6, 2025, no party or lawyer disclosed the cases to the court until Attorney Vartanian filed his declaration on January 23, 2026. In five of the eight cases, Lawyers for Justice—the same law firm that represents plaintiffs in this case—represents the plaintiffs. Lawyers for Justice did not advise the court of the existence of these cases (and, indeed, despite defense counsel's declaration and the court's November 6, 2025 order (ROA 344, Item No. 11), still has not addressed these cases). Does Lawyers for Justice agree that in the cases in which it represents the plaintiffs, and the plaintiffs include nonexempt individuals employed by defendant at either the JW Marriott Anaheim or the Marriott Marquis San Diego, the claims in those cases are barred up through and including November 3, 2023? See Vartanian Decl. ¶ 4. Lawyers for Justice should also identify the cases, if any, listed in the Vartanian Declaration in which the putative class/aggrieved employees includes nonexempt individuals employed by defendant at either

the JW Marriott Anaheim or the Marriott Marquis San Diego.

6. The proposed order and judgment (ROA 352) should be shortened and revised to omit redundant and repetitive provisions. In addition:

a. Counsel information should be removed from the caption page;

b. The Class and the Class Period and the Aggrieved Employees and the PAGA Period should be stated within the first few paragraphs of the proposed order and judgment;

c. The individuals who requested exclusion should be identified by name;

d. The proposed order and judgment should state that the settlement administrator did not receive any disputes;

e. The proposed order and judgment should include the following statement: "The parties, their counsel and the settlement administrator are ordered to administer the settlement in accordance with the terms of the settlement agreement";

f. The proposed order and judgment should include the following statement: "The court hereby enters judgment in accordance with the Settlement Agreement, the June 15, 2025 Order Granting Preliminary Approval (ROA 311), and this Order and Judgment";

g. Paragraph 23 should be revised to state that the settlement administrator will post the judgment on the settlement administrator's website for at least 180 days; and

h. The parties should propose a specific date for the final accounting hearing. (In his declaration, plaintiffs' counsel proposes a date in "December 2025," which the court presumes is a typographical error. Supp. Nordrehaug Decl. ¶ 19.) Should the motion for final approval be granted, the court will hold a final accounting hearing on a Thursday at 9:00 a.m. The final accounting hearing should occur after the deadline for class members to cash their checks. Plaintiffs shall submit a final accounting report at least 9 court days before the final accounting hearing regarding the status of the settlement administration. The final report must include all information necessary for the court to determine the total amount actually paid to class members and any amounts tendered to the State Controller's Office under the unclaimed property law.

The hearing on plaintiffs' motion for final approval is continued to June 11, 2026 at 2:00 p.m. in Department CX105 to enable the parties to address and respond to the above issues. A supplemental brief shall be filed at least 9 court days before the hearing and shall address as necessary each of the above points. If required, an amendment to the settlement agreement shall be submitted, rather than an "amended settlement agreement," to streamline the court's review of the documents. The parties shall provide redlined copies of any revised documents (e.g., revised settlement agreement, revised notice, revised proposed order).

Plaintiffs are ordered to give notice, including to the LWDA, and to file a proof of service. Plaintiffs must also serve the LWDA with any supplemental brief and any amended documents, and file a proof of service.