	1	Justin F. Marquez (SBN 262417) justin@wilshirelawfirm.com Arsiné Grigoryan (SBN 319517) agrigoryan@wilshirelawfirm.com WILSHIRE LAW FIRM 3055 Wilshire Blvd., 12th Floor Los Angeles, California 90010 Telephone: (213) 381-9988 Facsimile: (213) 381-9989 Attorneys for Plaintiff Leslie L. Abbott (SBN 155597) leslieabbott@paulhastings.com Aja S. Nunn (SBN 347676)		
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	10	ajanunn@paulhastings.com PAUL HASTINGS LLP		
	11	515 South Flower Street, Twenty-Fifth Floor Los Angeles, CA 90071		
	12	Telephone: (213) 683.6000		
4, PLC th Floor 0-1137	13	Facsimile: (213) 996.3310		
AW FIRA Blvd, 12 CA 9001(14	Attorneys for Defendant		
WILSHIRE LAW FIRM, PLC 3055 Wilshire Blvd, 12 th Floor Los Angeles, CA 90010-1137	15	SUPERIOR COURT OF THE	C STATE OF CALIF	ORNIA
WILS 3055 Los /	FOR THE COUNTY OF LOS ANGELES			
	17	AMEENA BROWN, individually, and on behalf	Case No.: 22STCV4	0574
	18	of all others similarly situated,		0574
	19	Plaintiff,	CLASS ACTION	
	20	V.	[Assigned for all pur] David S. Cunninghar	
	21	HEY BUI LLC DBA REFORMATION, a California limited liability company; and DOES	ADDENDUM TO JOINT STIPULATION OF SETTLEMENT AGREEMENT AND	
	22	1 through 10, inclusive,	RELEASE	AGREEMENT AND
	23	Defendants.	Complaint filed: FAC filed:	December 28, 2022 April 20, 2023
	24 25		Trial date:	Not set
	26			
	20			
	28			
	20	1		
		ADDENDUM TO JOINT STIPULATION OF SI	ETTLEMENT AGREEN	IENT AND RELEASE

ADDENDUM TO JOINT STIPULATION OF SETTLEMENT AGREEMENT AND RELEASE

This Addendum to Joint Stipulation of Settlement Agreement and Release dated April 8, 2024 is made by and between Plaintiff Ameena Brown ("Plaintiff") and Defendant Hey Bui dba Reformation ("Defendant") (collectively, the "Parties") and is executed following the Court's March 18, 2024 ruling during the Hearing on the Motion for Preliminary Approval of the Settlement. The following changes are hereby acknowledged and agreed to:

- (1) Plaintiff and Class Counsel may request that the Class Representative Award will be \$5,000.00, deducted from the Gross Settlement Amount.
- (2) Plaintiff and Class Counsel may request that the Class Counsel Fees Payment will be33.3% of the Gross Settlement Amount (\$58,333.33).
- (3) Accordingly, if the Court approves the above amounts pursuant to these amendments, the Net Settlement Amount available for Class Member settlement payments is now estimated to be \$71,666.67. Thus, each Settlement Class Member would be eligible to receive an average net benefit of approximately \$162.14.

Per Section 12.9 of the Joint Stipulation of Settlement Agreement and Release executed by the Parties, the agreement "and all parts of, may be amended, modified, changed or waived only by express written instrument signed by all Parties *or their representatives* and approved by the Court" [emphasis added].

[Signatures on following page]

WILSHIRE LAW FIRM, PLC 3055 Wilshire Blvd, 12th Floor Los Angeles, CA 90010-1137

	1	Dated: April 8, 2024	WILSHIRE LAW FIRM
	2		P Ruine Vierne
	3		By: <u>Justin F. Marquez</u>
	4		Arsiné Grigoryan
	5		Attorneys for Plaintiff
	6	Dated: April 8, 2024	PAUL HASTINGS LLP
	7		
	8		By: <u>/s/ Leslie Abbott</u> Leslie L. Abbott
	9		Leslie L. Abbott Aja S. Nunn
	10		Attorneys for Defendant
	11		
	12		
.M, PLC 2 th Flooi 10-1137	13		
.AW FIR Blvd, 1 CA 9001	14		
WILSHIRE LAW FIRM, PLC 3055 Wilshire Blvd, 12 th Floor Los Angeles, CA 90010-1137	15		
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		ADDENDUM TO JOINT STIPU	3 LATION OF SETTLEMENT AGREEMENT AND RELEASE

1	PROOF OF SERVICE Ameena Brown v. Hey Bui LLC dba Reformation				
2	22STCV40574				
3	STATE OF CALIFORNIA)				
4) ss COUNTY OF LOS ANGELES)				
5	I, Dariane Rose, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12 th Floor, Los Angeles, California 90010. My electronic service address is ssespene@wilshirelawfirm.com.				
6 7					
8	On April 8, 2024, I served the foregoing ADDENDUM TO JOINT STIPULATION OF				
9	SETTLEMENT AGREEMENT AND RELEASE, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:				
10	Leslie L. Abbott (SBN 155597)				
11	LeslieAbbott@paulhastings.com Aja S. Nunn (SBN 347676)				
12	ajanunn@paulhastings.com Irma Gamino				
13	irmagamino@paulhastings.com				
14	PAUL HASTINGS LLP 515 South Flower Street, Twenty-Fifth Floor				
15	Los Angeles, CA 90071 Telephone: (213) 683.6000				
16	Facsimile: (213) 996.3310				
17	Attorneys for Defendant Hey Bui LLC DBA Reformation				
18	(X) BY ELECTRONIC SERVICE: Based on a court order or an agreement of the parties				
19 20	to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service CASEANYWHERE .				
21	I declare under the penalty of perjury under the laws of the State of California, that the				
22	foregoing is true and correct.				
23	Executed on April 8, 2024, at Los Angeles, California.				
24	Bariane Rose				
25	Bariane Rose				
26					
27					
28					
	PROOF OF SERVICE				

WILSHIRE LAW FIRM, PLC 3055 Wilshire Blvd, 12th Floor Los Angeles, CA 90010-1137