ADDENDUM TO CLASS ACTION AND PAGA SETTLEMENT AGREEMENT

The Parties to this Addendum to the Class Action and PAGA Settlement Agreement

("Addendum") are Plaintiff Amanda Redmond "Plaintiff" and Defendant Flatiron West, Inc.

(collectively "Flatiron" or "Defendant" erroneously sued as Flatiron Constructors Inc., the

purported dba, and Flatiron Construction Corp.). This Addendum is for the benefit of Plaintiff

and Defendant (collectively the "Parties"), as those terms were defined in the Class Action and

PAGA Settlement Agreement ("Agreement") fully executed by Plaintiff and Defendant on

August 13, 2024.

In conformance with the Judge's Ruling at the January 16, 2025 Hearing on the Motion

for Preliminary Approval of Class and PAGA Settlement regarding notice, the Settling Parties

agree to extend the deadlines for Class Members to opt-out, provide written objections, and/or

dispute the number of workweeks from 30 days to 45 days, and thereby modify the terms of the

Agreement as follows:

The number "45" replaces number "30" in paragraphs 1.45, 7.43, 7.51, 7.6, and

**7.72**:

Other than as expressly modified herein, all provisions of the Agreement remain in effect

and apply to this Addendum.

IT IS SO AGREED:

**SIGNATURES** 

**PLAINTIFF:** 

Dated: \_\_\_\_

amanda Kedmond

Amanda Redmond

FLATIRON WEST, INC.	
By:	
ATES, INC.	
- Dim	
David Yeremian Attorneys for Plaintiff	
Roman Alhahid	
Emil Davtyan Roman Shkodnik Attorneys for Plaintiff	
ROUP, PC	
Walter Haines Attorneys for Plaintiff	
Lonnie D. Giamela	
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	By: David Yeremian Attorneys for Plaintiff  Emil Davtyan Roman Shkodnik Attorneys for Plaintiff  Walter Haines Attorneys for Plaintiff

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By:
ATES, INC.
David Yeremian Attorneys for Plaintiff
Emil Dantage
Emil Davtyan Roman Shkodnik Attorneys for Plaintiff
ROUP, PC
Mc Johanne
Walter Haines Attorneys for Plaintiff
Lonnie D. Giamela
Areen Babajanian Attorneys for Defendant
FLATIRON WEST, INC.

DEFENDANT:	
Dated: 2/7/25	Delle
	FLATIRON WEST, INC.
	By: Executive Vice President
DAVID YEREMIAN & ASSOCIA	TES, INC.
Dated:	
	David Yeremian Attorneys for Plaintiff
D.LAW, INC.	
Dated:	E 1D /
	Emil Davtyan Roman Shkodnik Attorneys for Plaintiff
UNITED EMPLOYEES LAW GR	OUP, PC
Dated:	
	Walter Haines Attorneys for Plaintiff
FISHER & PHILLIPS LLP	
Dated: February 7, 2025	New Patrajanian
	Lonnie D. Giamela
	Areen Babajanian
	Attorneys for Defendant
	FLATIRON WEST, INC.