

ADDENDUM TO THE CLASS ACTION AND PAGA SETTLEMENT AGREEMENT

This Addendum to the Class Action and PAGA Settlement Agreement (“Addendum”) is made by and between Plaintiff SEAN GITTENS (“Plaintiff”) and Defendants NVA MASH Capital Partners LP, NVA MASH Veterinary Management LP, NVA Abby GP, Inc., National Veterinary Associates, Inc. (“Defendants”). The Addendum refers to Plaintiff and Defendants collectively as “Parties,” or individually as “Party.”

Pursuant to the Court’s October 6, 2025, Order, the Parties are revising the relevant portions of the Class and PAGA Settlement Agreement, executed on March 31, 2025. The following changes are being made to the Settlement Agreement:

Section 4.4.3 of the Settlement Agreement is revised as follows:

4.4.3. For any Class Member whose Individual Class Payment check or Individual PAGA Payment check is uncashed and cancelled after the void date, the Administrator shall transmit the funds represented by such checks to the State of California Controller’s Office in the name of the individual who did not cash the check.

Section 6.1 of the Settlement Agreement is revised as follows:

6.1 Plaintiff’s Responsibilities. Plaintiff will prepare and deliver to Defense Counsel all documents necessary for obtaining Preliminary Approval, including: (i) a draft of the notice, and memorandum in support, of the Motion for Preliminary Approval that includes an analysis of the Settlement under Dunk/Kullar and a request for approval of the PAGA Settlement under Labor Code Section 2699, subd. (f)(2)); (ii) a draft proposed Order Granting Preliminary Approval and Approval of PAGA Settlement; (iii) a draft proposed Class Notice; (iv) a signed declaration from the Administrator attaching its “not to exceed” bid for administering the Settlement and attesting to its willingness to serve; competency; operative procedures for protecting the security of Class Data; amounts of insurance coverage for any data breach, defalcation of funds or other misfeasance; (v) a signed declaration from Plaintiff confirming willingness and competency to serve and disclosing all facts relevant to any actual or potential conflicts of interest with Class Members, and/or the Administrator; (v) a signed declaration from each Class Counsel firm attesting to its competency to represent the Class Members; its timely transmission to the LWDA of all necessary PAGA documents (initial notice of violations (Labor Code section 2699.3, subd. (a)), Operative Complaint (Labor Code section 2699, subd. (l)(1)), this Agreement (Labor Code section 2699, subd. (l)(2)); (vi) a redlined version of the parties’ Agreement showing all modifications made to the Model Agreement ready for filing with the Court; and (vii) all facts relevant to any actual or potential conflict of interest with Class Members, and/or the Administrator. In their Declarations, Plaintiff and Class Counsel Declaration shall aver that they are not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

The Notice to the Class Members shall also be revised to reflect these changes.

All other provisions of the Class Action and PAGA Settlement Agreement shall remain unchanged.

PLAINTIFF/CLASS REPRESENTATIVE

DATED: November 3, 2025

DocuSigned by:

By: _____
Plaintiff SEAN GITTENS

DEFENDANTS

DATED: November 3, 2025


By: _____
Authorized to sign on behalf of Defendants
NVA MASH CAPITAL PARTNERS, LP;
NVA MASH VETERINARY
MANAGEMENT, LP; NVA ABBY GP, INC.;
and NATIONAL VETERINARY
ASSOCIATES, INC.

APPROVED AS TO FORM:

DATED: _____, 2025

MEDINA MCKELVEY LLP

By: _____
Alexander M. Medina
Douglas R. Leach
Attorneys for Defendants NVA CAPITAL
PARTNERS, LP; NVA MASH
VETERINARY MANAGEMENT, LP;
NVA ABBY GP, INC.; and NATIONAL
VETERINARY ASSOCIATES, INC.

DATED: _____, 2025

DLAW, INC.

By: _____
David Yeremian
David Keledjian
David Arakelyan
Attorneys for Plaintiff SEAN GITTENS and

All other provisions of the Class Action and PAGA Settlement Agreement shall remain unchanged.

PLAINTIFF/CLASS REPRESENTATIVE

DATED: _____, 2025

By: _____
Plaintiff SEAN GITTENS

DEFENDANTS

DATED: ^{11/4/2025} _____, 2025

Signed by:

AED85D49686643F...
By: _____
Authorized to sign on behalf of Defendants
NVA MASH CAPITAL PARTNERS, LP;
NVA MASH VETERINARY
MANAGEMENT, LP; NVA ABBY GP, INC.;
and NATIONAL VETERINARY
ASSOCIATES, INC.

APPROVED AS TO FORM:

DATED: November 4, 2025

MEDINA MCKELVEY LLP

By: 
Alexander M. Medina
Douglas R. Leach
Attorneys for Defendants NVA CAPITAL
PARTNERS, LP; NVA MASH
VETERINARY MANAGEMENT, LP;
NVA ABBY GP, INC.; and NATIONAL
VETERINARY ASSOCIATES, INC.

DATED: _____, 2025

DLAW, INC.

By: _____
David Yeremian
David Keledjian
David Arakelyan
Attorneys for Plaintiff SEAN GITTENS and