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11 Trung Le and Kevin Lam

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF ORANGE**

14 TRUNG LE, individually, KEVIN LAM,
15 individually, and on behalf of other members
of the general public similarly situated,

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28)
Plaintiff,

v.

M4D LLC, and DOES 1 through 25,

Defendants.

CASE NO.: 30-2021-01182977
[Honorable Judge Melissa R. McCormick,
Dept. CX104]

**ADDENDUM TO CLASS ACTION AND
PAGA SETTLEMENT AGREEMENT**

FAC Filed: August 11, 2022
Complaint Filed: February 5, 2021
Trial Date: None Set

1 This Addendum to Class Action and PAGA Settlement Agreement (the “Agreement”) is
2 made by and between Plaintiff Kevin Lam (“Plaintiff”) and Defendant M4D, LLC (“Defendant”
3 or “M4D”). The Agreement and this Addendum thereto refer to Plaintiff Lam and Defendant
4 M4D collectively as the “Parties,” or individually as a “Party.”

5 The Parties agree that the Court shall have continuing jurisdiction over the Agreement
6 and settlement terms pursuant to California Code of Civil Procedure § 664.6.
7

8 DATED: September 18, 2023

THE GOULD LAW FIRM
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9
10 /s/ Aarin A. Zeif

11 By: _____

Michael A. Gould
Aarin Zeif
Attorneys for Plaintiff
Kevin Lam

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14 DATED: September 18, 2023

O’HAGAN MEYER

15
16
17 By: /s/ Katherine C. Den Bleyker

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