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9 *Attorneys for the Plaintiffs*

10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF SAN MATEO

12 AARON VAN FLEET, PAUL OVBERG, and  
13 JAMES LONGFIELD, individually and on  
14 behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 TRION WORLDS, INC.,

18 Defendant.

NO. CIV 535304

**PLAINTIFFS' NOTICE OF  
ERRATA**

Complaint Filed: September 8, 2015

CLASS ACTION

Assigned for All Purposes to:  
Honorable Marie S. Weiner, Department 2

DEPARTMENT: 2

DATE: October 18, 2019

TIME: 10:00 a.m.

19 TO: THE CLERK OF COURT; and

20 TO: DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

21 Plaintiffs submit this notice of errata to correct the Declaration of Trion Worlds (ABC)  
22 LLC in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement filed  
23 with the Court on September 27, 2019. The declaration was inadvertently placed on the wrong  
24 case caption and the refiled declaration corrects this technical error. No substantive changes  
25 have been made to the declaration.  
26  
27

1 RESPECTFULLY SUBMITTED AND DATED this 1st day of October, 2019.

2 TERRELL MARSHALL LAW GROUP PLLC

3  
4 By: /s/ Elizabeth A. Adams, CSB #290029  
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*Attorneys for the Plaintiffs*

1 **PROOF OF SERVICE**

2 I am a citizen of the United States and am employed in King County, Washington. I am  
3 over the age of eighteen (18) years and not a party to this action; my business address is 936  
4 North 34th Street, Suite 300, Seattle, Washington, 98103-8869.

5 On October 1, 2019, I served the preceding document by placing a true copy thereof  
6 enclosed in a sealed envelope and served in the manner and/or manners described below to  
7 each of the parties herein and addressed as on the attached list.

8  
9  **BY MAIL:** I caused such envelope(s) to be deposited in the mail at my business address,  
10 addressed to the addressee(s) designated. I am readily familiar with Terrell  
11 Marshall Law Group PLLC’s practice for collection and processing of  
12 correspondence and pleadings for mailing. It is deposited with the United States  
13 Postal Service on that same day in the ordinary course of business.

14  **BY HAND DELIVERY:** I caused such envelope(s) to be delivered by hand to the  
15 addressee(s) designated.

16  **BY OVERNIGHT COURIER SERVICE:** I caused such envelope(s) to be delivered via  
17 overnight courier service to the addressee(s) designated.

18  **BY FACSIMILE:** I caused said document to be transmitted to the telephone number(s) of  
19 the addressee(s) designated.

20  **BY ELECTRONIC MAIL:** I caused said document to be transmitted to the email  
21 addresses of the addressee(s) designated.

22 I declare under penalty of perjury under the laws of the State of Washington that the  
23 foregoing is true and correct.

24 Executed at Seattle, Washington, on the 1st day of October, 2019.

25 /s/ Elizabeth A. Adams, CSB #290029  
26 Elizabeth A. Adams, CSB #290029  
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**PROOF OF SERVICE LIST**

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The Honorable Marie S. Weiner  
Department 2  
San Mateo County Superior Court  
400 County Center, Courtroom 2E  
Redwood City, California 94063

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6 TRION WORLDS (ABC) LLC a California limited liability  
COMPANY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN MATEO

11 AARON VAN FLEET, PAUL OVBERG,  
and JAMES LONGFIELD, individually and  
12 on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 TRION WORLDS INC.,

16 Defendant.

NO. CIV 535304

**DECLARATION OF TRION  
WORLDS (ABC) LLC IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

17  
18 I, Michael Hogan, declare as follows:

19  
20 1. I am an Authorized Representative of Trion Worlds (ABC) LLC, a California  
21 limited liability company (the "Assignee"). Unless otherwise stated, I have personal knowledge of  
22 the facts contained herein and if called to testify, could and would testify competently thereto.

23 2. Trion Worlds, Inc. (the "Company") made a general assignment for the benefit of  
24 creditors under California law to the Assignee, on October 22, 2018 (the "Assignment").

25 3. The Assignee marketed the assets of the Company over a 45-day period to  
26 approximately 100 parties and as a result of that process has sold the Company's assets to an  
27 unaffiliated third party in an effort to maximize the value for the Company's creditors.

