Daniel M. Hattis, WSBA No. 50428
dan@hattislaw.com
Che Corrington, WSBA No. 54241
che@hattislaw.com
HATTIS LUKACS & CORRINGTON
11711 SE 8th St., Suite 120
Bellevue, WA 98005
Telephone: (425) 233-8650
Facsimile: (425) 412-7171

Attorneys for Plaintiff and the Proposed Class

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SHAWNNA MONTES,
for herself, as a private attorney general, and on behalf of all others similarly situated,

Plaintiff,

v.

CATALYST BRANDS LLC, SPARC GROUP LLC, and PENNEY OPCO LLC,

Defendants.

Case No. 2:25-cv-00281-TOR

PLAINTIFF'S NOTICE OF APPEAL

Notice is hereby given that Plaintiff Shawnna Montes hereby appeals to the United States Court of Appeals for the Ninth Circuit from this Court's Order on Defendants' Motion to Dismiss First Amended Complaint entered in this action on December 4, 2025 (Dkt. 14); from this Court's Judgment entered in this action on December 4, 2025 (Dkt. 15); and from this Court's Order on Plaintiff's Motion for Reconsideration entered in this action on January 8, 2026 (Dkt. 22).

This is a cross-appeal. The first appeal case number is: 25-8045.

Plaintiff's Representation Statement is attached to this Notice as required by Ninth Circuit Rule 3-2.

Dated: January 8, 2026

HATTIS LUKACS & CORRINGTON

By: */s/ Che Corrington*

Che Corrington, WSBA No. 54241
Daniel M. Hattis, WSBA No. 50428
HATTIS LUKACS & CORRINGTON
11711 SE 8th St., Suite 120
Bellevue, WA 98005
Telephone: (425) 233-8650
Facsimile: (425) 412-7171
Email: che@hattislaw.com
Email: dan@hattislaw.com

Attorneys for Plaintiff and the Proposed Class

HATTIS LUKACS & CORRINGTON
11711 SE 8th St, Ste 120
Bellevue, WA 98005
Tel: 425.233.8650 | Fax: 425.412.7171
www.hattislaw.com

REPRESENTATION STATEMENT

The following table identifies all parties to the action and their respective counsel:

Party	Counsel
Plaintiff and Appellant Shawnna Montes	Daniel M. Hattis Che Corrington HATTIS LUKACS & CORRINGTON 11711 SE 8th St., Suite 120 Bellevue, WA 98005 Telephone: (425) 233-8650 Facsimile: (425) 412-7171 Email: che@hattislaw.com Email: dan@hattislaw.com
Defendants and Appellees Catalyst Brands LLC, SPARC Group LLC, and Penney OpCo LLC	David R. Ebel Davis Leigh Schwabe, Williamson & Wyatt, P.C. 1420 5th Avenue, Suite 3400 Seattle, WA 98101 Telephone: 206-622-1711 Facsimile: 206-292-0460 debel@schwabe.com dbleigh@schwabe.com Christopher E. Stretch Meegan B. Brooks Benesch Friedlander Coplan & Aronoff LLP 100 Pine Street, Suite 3100 San Francisco, CA 94111 Tel: 628.600.2250 cstretch@beneschlaw.com mbrooks@beneschlaw.com Michael D. Meuti Benesch Friedlander Coplan & Aronoff LLP 127 Public Square, Suite 4900 Cleveland, OH 44114 Tel: 216.363.4500 mmeuti@beneschlaw.com

HATTIS LUKACS & CORRINGTON
11711 SE 8th St, Ste 120
Bellevue, WA 98005
Tel: 425.233.8650 | Fax: 425.412.7171
www.hattislaw.com

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington and the United States of America that on the 8th day of January, 2026, the document attached hereto was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in the matter.

Dated: January 8, 2026

/s/ Che Corrington
Che Corrington, WSBA No. 54241

HATTIS LUKACS & CORRINGTON
11711 SE 8th St, Ste 120
Bellevue, WA 98005
Tel: 425.233.8650 | Fax: 425.412.7171
www.hattislaw.com