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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES COUNTY

SERGIO ARELLANO, EDGAR MURILLO,
JOHN HENRY, and CURT UYEMURA,
individually, and on behalf of other members of
the general public similarly situated,

Plaintiffs,

vs.

R&B SALES AND MARKETING, INC., a
Delaware corporation; TECHTRONIC
INDUSTRIES NORTH AMERICA, INC., a
Delaware corporation; and DOES 1 through 10,
inclusive,

Defendants.

FILED
Superior Court of California
County of Los Angeles
04/29/2022
Sherri R. Carter, Executive Officer / Clerk of Court
By: L. M'Greené Deputy

Case No.: 20STCV04112

Assigned to the Hon. Carolyn B. Kuhl
Spring Street Courthouse; Department 12

**JOINT STIPULATION TO AMEND THE
SCHEDULE FOR SETTLEMENT
ADMINISTRATION; ~~PROPOSED~~ ORDER
RE AMENDED SCHEDULE FOR
SETTLEMENT ADMINISTRATION**

1 This Joint Stipulation is made and entered into by and between Plaintiffs Sergio Arellano, Edgar
2 Murillo, John Henry and Curt Uyemura (“Plaintiffs”), by and through their respective counsel of record,
3 and Defendants Techtronic Industries North America, Inc. and R&B Sales and Marketing, Inc.
4 (“Techtronic Industries North America, Inc. and R&B Sales and Marketing, Inc.”) (collectively with
5 Plaintiffs, the “Parties”), by and through their counsel of record.

6 **WHEREAS**, on March 16, 2022, the Court granted preliminary approval of the Parties’ class
7 action settlement.

8 **WHEREAS**, the Order Granting Preliminary Approval of Class Action Settlement (“Order”)
9 directed the Settlement Administrator to mail the Notice Packets by April 4, 2022.

10 **WHEREAS**, the mailing of the Notice Packets was delayed because the Settlement
11 Administrator needed supplemental information / clarifications about the class data from Defendants, to
12 calculate estimated payments from the settlement.

13 **WHEREAS**, in addition to the above, the Settlement Administrator requested that the Parties
14 approve an additional \$7,128 in administration expenses to cover the cost of providing CAFA notice
15 pursuant to Paragraph 67(a) of the Amended Stipulation and Agreement to Settle Class Action (not
16 originally included in the Settlement Administrator’s bid for administration). The additional cost would
17 be paid exclusively from the Non-California FLSA Fund.

18 **WHEREAS**, Notice Packets are now ready to be mailed;

19 **WHEREAS**, the Parties have met and conferred and have agreed to modify the schedule for
20 settlement administration, and to continue the Final Approval Hearing. The Parties have also agreed to
21 deduct an additional \$7,128 in administration expenses from the Non-California FLSA Fund to cover the
22 cost of providing CAFA notice;


23 **NOW THEREFORE, IT IS HEREBY STIPULATED** by the Parties, through their counsel
24 of record, as follows: The following proposed dates shall govern for purposes of settlement:

Date	Event
May 20, 2022	Last day for the Settlement Administrator to mail Notice Packets to all California Settlement Class Members and Non-California Opt-In Eligible Plaintiffs.

Date	Event
July 19, 2022 (or not later than 60 calendar days after the Settlement Administrator mails the Notice Packets, if later)	Last day for California Settlement Class Members to submit Requests for Exclusion or Objections to the Settlement, and for Non-California Opt-In Eligible Plaintiffs to return the Opt-In Forms.
16 court days prior to the Final Approval Hearing	Last day for Plaintiffs to file the Motion for Final Approval of Class and Collective Action Settlement and Motion for Attorneys' Fees, Costs, and Service Awards.
September 6, 2022 at 10:30 a.m.	Hearing on Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and Service Awards.

IT IS SO STIPULATED.

Dated: April 28, 2022

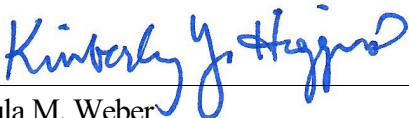
By: 

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Attorneys for Plaintiffs Sergio Arellano, Edgar Murillo, John Henry and Curt Uyemura

Dated: April 28, 2022

By: 

Paula M. Weber
 Kimberly Y. Higgins
PILLSBURY WINTHROP SHAW PITTMAN LLP

Attorneys for Defendants Techtronic Industries North America, Inc. and R&B Sales and Marketing, Inc.

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~~PROPOSED~~ ORDER

Based on the Parties' stipulation, and **GOOD CAUSE** having been shown, the following dates shall govern for purposes of this Settlement:

Date	Event
May 20, 2022	Last day for the Settlement Administrator to mail Notice Packets to all California Settlement Class Members and Non-California Opt-In Eligible Plaintiffs.
July 19, 2022 (or not later than 60 calendar days after the Settlement Administrator mails the Notice Packets, if later)	Last day for California Settlement Class Members to submit Requests for Exclusion or Objections to the Settlement, and for Non-California Opt-In Eligible Plaintiffs to return the Opt-In Forms.
16 court days prior to the Final Approval Hearing	Last day for Plaintiffs to file the Motion for Final Approval of Class and Collective Action Settlement and Motion for Attorneys' Fees, Costs, and Service Awards.
September 6, 2022 at 10:30 a.m.	Hearing on Motion for Final Approval of Class Action Settlement and Motion for Attorneys' Fees, Costs, and Service Awards.

The Court also approves an additional \$7,128 in administration expenses from the Non-California FLSA Fund to cover the cost of providing CAFA notice.

IT IS SO ORDERED.

Dated: 04/29/2022



Carolyn B. Kuhl

Carolyn B. Kuhl / Judge

Hon. Carolyn B. Kuhl
Los Angeles County Superior Court Judge

PROOF OF SERVICE

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within suit; my business address is 1875 Century Park East, Suite 1000, Los Angeles, California 90067.

On **April 28, 2022**, I served the document(s) described as: **JOINT STIPULATION TO AMEND THE SCHEDULE FOR SETTLEMENT ADMINISTRATION; [PROPOSED] ORDER RE AMENDED SCHEDULE FOR SETTLEMENT ADMINISTRATION** on the interested parties in this action by sending [] the original [] a true copy thereof [] to interested parties as follows [or] [] as stated on the attached service list:

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JOHN HENRY and CURT UYEMURA

BY MAIL (ENCLOSED IN A SEALED ENVELOPE): I deposited the envelope(s) for mailing in the ordinary course of business at Los Angeles, California. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

BY FAX TRANSMISSION: At or before 5:00 pm, I caused said document(s) to be transmitted by facsimile. The name(s) and facsimile machine telephone number(s) of the person(s) served are set forth in the service list. The document was transmitted by facsimile transmission, and the sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

BY PERSONAL SERVICE: I caused delivery of the document(s), enclosed in a sealed envelope, by hand via ProLegal Network to the offices of the addressee(s) named herein.

BY ELECTRONIC SERVICE: Pursuant to Court Order, I hereby certify that I caused a true and correct copy of the document(s) listed above to be served electronically on counsel of record via transmission to an electronic service provider.

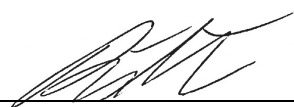
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() **BY OVERNIGHT DELIVERY:** I am “readily familiar” with this firm’s practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **April 28, 2022**, at Los Angeles, California.

Riley McIntire
Type or Print Name


Signature