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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

JUN 30 2022

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BY Christian Hernandez
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Attorneys for Plaintiffs, the Putative Settlement Class, the LWDA, and the Aggrieved Employees.

[Additional counsel on following page]

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

LUIS ANGEL ROBLES GARCIA and
MARTIN GARCIA VERA, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

VAN DRUNEN FARMS – GOLDEN STATE
HERBS, INC., a California Corporation,

Defendant.

CASE NO: CIVSB2125302

**JOINT STIPULATION FOR A ~~PROPOSED~~
NUNC PRO TUNC ORDER AMENDING
ORDER GRANTING MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Filed Concurrently with Proposed Order]

[Assigned for all purposes to
The Honorable David Cohn, Dept. S-26]

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1 Plaintiffs Luis Angel Robles Garcia and Martin Garcia Vera (“Plaintiffs”) and Defendant Van
2 Drunen Farms – Golden State Herbs, Inc. (“Defendant”) (Plaintiffs and Defendant collectively referred to
3 as “the Parties”), by and through their undersigned counsel, hereby jointly stipulate and agree as follows:

4 **STIPULATION**

5 WHEREAS, June 16, 2021, the Court issued its Order granting Plaintiffs’ motion for final approval
6 of the Parties’ class action settlement (“FA Order”).

7 WHEREAS, paragraph 16.d of the FA Order states “The \$6,250 requested by Plaintiffs for each
8 Class Representative Payment is fair and reasonable.” This was a typographical error made by Plaintiffs’
9 counsel, whereby the actual amount of Plaintiff Garcia’s Class Representative Payment should have been
10 \$7,500 and the actual amount of Plaintiff Vera’s Class Representative Payment should have been \$5,000.

11 WHEREAS, the Parties’ Joint Stipulation and Settlement Agreement of Class Action and PAGA
12 Claims (the “Settlement Agreement”) states that Plaintiff Garcia is to receive a Class Representative
13 Payment in the amount of \$7,500 and that Plaintiff Vera is to receive a Class Representative payment in
14 the amount of \$5,000, amounts that were included in the notice disseminated to the Class, and
15 preliminarily approved by the Court.

16 WHEREAS, the Parties believe that Plaintiff Garcia’s Class Representative Payment of \$7,500 is
17 fair and reasonable because of his involvement in the case, including attending and participating in the
18 mediation.

19 WHEREAS, paragraph 16.d of the FA Order should be modified to “The \$7,500 requested by
20 Plaintiff Garcia and \$5,000 requested by Plaintiff Vera for their respective Class Representative Payments
21 (totaling \$12,500.00) is fair and reasonable.”

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1 IT IS THEREFORE HEREBY STIPULATED that an order *nunc pro tunc* should be issued
2 amending the Final Approval Order to read as follows in paragraph 16.d, "The \$7,500 requested by
3 Plaintiff Garcia and \$5,000 requested by Plaintiff Vera for their respective Class Representative Payments
4 (totaling \$12,500.00) is fair and reasonable."

5
6 DATED: June 20, 2022

ACKERMANN & TILAJEF, P.C.
LAW OFFICE OF TATIANA HERNANDEZ, P.C.

7
8 By: /s/Craig J. Ackermann
9 Craig J. Ackermann, Esq.
Attorneys for Plaintiffs and the Class

10 DATED: June 20, 2021

GOLDBERG KOHN LTD.

11
12 By: /s/Jon E. Klinghoffer
13 Jon E. Klinghoffer, Esq.
14 Attorneys for Defendant
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