

1 ANTHONY J. ORSHANSKY (SBN 199364)  
anthony@counselonegroup.com  
2 JENNIFER L. CONNOR (SBN 241480)  
jennifer@counselonegroup.com  
3 **COUNSELONE, PC**  
9301 Wilshire Boulevard, Suite 650  
4 Beverly Hills, California 90210  
Tel: (310) 277-9945 / Fax: (424) 277-3727  
5

6 EDWIN AIWAZIAN (SBN 232943)  
edwin@calljustice.com  
7 **LAWYERS for JUSTICE, PC**  
410 West Arden Avenue, Suite 203  
8 Glendale, California 91203  
Tel: (818) 265-1020 / Fax: (818) 265-1021  
9 *Attorneys for Plaintiff*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES**

12 DELIA BORREGO, individually, and on  
13 behalf of other members of the general public  
similarly situated and on behalf of other  
14 aggrieved employees pursuant to the California  
Private Attorneys General Act,

15 Plaintiff,

16 vs.

17 PRECISION TOXICOLOGY, LLC, a  
18 California limited liability company;  
PRECISION DIAGNOSTICS, an unknown  
19 business entity; and DOES 1 through 100,  
inclusive,

20 Defendants.  
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Case No. 19STCV46037

Honorable William Highberger  
Dept. 10

**CLASS ACTION**

**AMENDMENT TO STIPULATION  
OF CLASS AND REPRESENTATIVE  
ACTION SETTLEMENT**

**Preliminary Approval Hearing:**

Hearing Date: May 13, 2022

Time: 10:00 a.m.

CrtRm. 10

1 **AMENDMENT TO STIPULATION OF CLASS AND PAGA ACTION SETTLEMENT**

2 Plaintiff Delia Borrego (“Plaintiff”), on behalf of herself and others similarly situated,  
3 and Defendant Precision Toxicology, LLC (“Defendant”), by and through their counsel of  
4 record, hereby stipulate as follows, subject to Court approval:

5 1. All terms reference herein shall be defined as they are defined in the Stipulation  
6 of Class and Representative Action Settlement (“Settlement Agreement”) that was fully executed  
7 on March 02, 2022.

8 2. Paragraph 56.d. of the Settlement Agreement, with the section heading is amended  
9 to read as follows: “Settlement checks will be valid for a period of one and eighty (180) calendar  
10 days from the date of issuance, and after this time period, any uncashed check(s) will be cancelled  
11 and the funds associated with such cancelled checks will be transmitted *to the Controller of the*  
12 *State of California to be held pursuant to the Unclaimed Property Law, California Code of Civil*  
13 *Procedure, § 1500 et seq. in the names of the Settlement Class Members and PAGA Group*  
14 *Members who did not cash their settlement checks until such time as they claim their property.”*

15 **IT IS SO AGREED.**

16  
17 Dated: \_\_\_\_\_



18 Anthony J. Orshansky, Esq.  
19 Jennifer L. Connor, Esq.  
20 CounselOne, PC

21 Edwin Aiwazian  
22 Lawyers *for* Justice, PC  
23 Attorneys for Plaintiff

24 Dated: May 18, 2022



25 Sat Sang S. Khalsa, Esq.  
26 Joshua B. Wagner, Esq.  
27 Attorneys for Defendant  
28 Precision Toxicology, LLC