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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF ALAMEDA

11 GELIN TURCIO TOLEDO individually, and on
12 behalf of other members of the general public
similarly situated,

13 Plaintiff,

14 vs.

15 COLUMBUS MANUFACTURING, INC., a
Delaware corporation; HORMEL FOODS
16 CORPORATION, a Delaware corporation;
HORMEL FOODS INTERNATIONAL
17 CORPORATION, a Delaware corporation;
HORMEL FOODS CORPORATE SERVICES,
18 LLC, a Delaware limited liability company;
HORMEL FOODS OPERATIONS, LLC, a
19 Minnesota limited liability company; HORMEL
FOODS SALES, LLC, a Delaware limited
20 liability company; and DOES 1 through 10,
inclusive,

21 Defendants.

Case No. RG21106838

**JOINT STIPULATION RE DISBURSEMENT
OF UNCLAIMED SETTLEMENT
RESIDUALS TO THE JUSTICE GAP FUND**

Complaint Filed: July 28, 2021

Trial Date: None Set

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1 This Joint Stipulation is made and entered into by and between Plaintiffs Maria Garcia Ruiz and
2 Gelin Turcios Toledo (“Plaintiffs”), by and through their respective counsel of record, and Defendants
3 Columbus Manufacturing, Inc., Hormel Foods Corporation, Hormel Foods International Corporation,
4 Hormel Foods Corporate Services, LLC, Hormel Foods Operations, LLC, and Hormel Foods Sales,
5 LLC (“Columbus Manufacturing, Inc., Hormel Foods Corporation, Hormel Foods International
6 Corporation, Hormel Foods Corporate Services, LLC, Hormel Foods Operations, LLC, and Hormel
7 Foods Sales, LLC”) (collectively with Plaintiffs, the “Parties”), by and through their counsel of record.

8 In response to the Court’s concern, the Parties stipulate to the following modification to the Joint
9 Stipulation of Class Action and PAGA Settlement and Release: Funds represented by Individual
10 Settlement Payment checks returned as undeliverable and Individual Settlement Payment checks
11 remaining un-cashed for more than one hundred and eighty (180) calendar days after issuance will be
12 tendered to the Justice Gap Fund maintained by the State Bar of California.

13 **IT IS SO STIPULATED.**

14 **CAPSTONE LAW APC**

15 Dated: November 22, 2023

16 By: /s/ Orlando Villalba
Orlando Villalba
Attorneys for Plaintiff Gelin Turcios Toledo

18 **BIBIYAN LAW GROUP**

19 Dated: November 22, 2023

20 By: /s/ Vedang J. Patel
David B. Bibiyani
Vedang J. Patel
Attorneys for Plaintiff Maria Garcia Ruiz

23 **OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

24 Dated: November 22, 2023

25 By: /s/ Jade Butman
Jade Butman
Attorneys for Defendants Columbus Manufacturing,
26 Inc., Hormel Foods Corporation, Hormel Foods
27 International Corporation, Hormel Foods Corporate
Services, LLC, Hormel Foods Operations, LLC, and
28 Hormel Foods Sales, LLC

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 **November 22, 2023**, I served the document(s) described as: **JOINT STIPULATION RE DISBURSEMENT OF UNCLAIMED SETTLEMENT RESIDUALS TO THE JUSTICE GAP FUND** 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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COLUMBUS MANUFACTURING, INC.;
HORMEL FOODS CORPORATION;
HORMEL FOODS INTERNATIONAL
CORPORATION;
HORMEL FOODS CORPORATE
SERVICES, LLC;
HORMEL FOODS OPERATIONS, LLC;
HORMEL FOODS SALES, LLC

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Attorneys for Plaintiffs:
Maria Garcia Ruiz

[] **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.

[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.

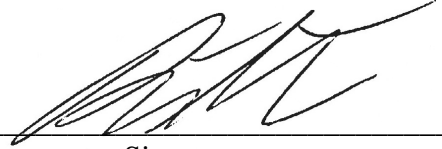
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- [] **BY FAX:** I hereby certify that this document was served from Los Angeles, California, by facsimile delivery on the parties listed herein at their most recent fax number of record in this action.
- [] **BY PERSONAL SERVICE:** I caused delivery of the document(s), enclosed in a sealed envelope, by hand via ProLegal Network to the offices of the addressee(s) named herein.
- [] **BY 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.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **November 22, 2023**, at Los Angeles, California.

Riley McIntire

Type or Print Name



Signature