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Attorneys for Defendant
HOAG MEMORIAL HOSPITAL PRESBYTERIAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

YAMA SAIDI, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

HOAG MEMORIAL HOSPITAL
PRESBYTERIAN; and DOES 1 through
20, inclusive,

Defendants.

Case No.: 30-2021-01235263-CU-OE-CXC
Case No.: 30-2021-01228182-CU-OE-CXC

**AMENDMENT TO STIPULATION AND
SETTLEMENT AGREEMENT OF CLASS
ACTION CLAIMS AGAINST HOAG
MEMORIAL HOSPITAL PRESBYTERIAN**

Assigned to Judge Randall J. Sherman
Dept. CX-105

Complaint Filed: December 8, 2021

INSOOK ELLEN KIM, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

HOAG MEMORIAL HOSPITAL
PRESBYTERIAN, a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Assigned to Judge Randall Sherman
Dept. CX-105

Complaint Filed: October 22, 2021

1 Named Plaintiffs Insook Ellen Kim, Yama Saidi, and Jennifer Choi (“Named Plaintiffs”)
2 and the Class Members, on the one hand, and Defendant Hoag Memorial Hospital Presbyterian
3 (“Defendant”), on the other hand, pursuant to Section III(N) of the STIPULATION AND
4 SETTLEMENT AGREEMENT OF CLASS ACTION CLAIMS AGAINST HOAG
5 MEMORIAL HOSPITAL PRESBYTERIAN (“Agreement” or “Settlement”), hereby agree to
6 amend the Agreement as stated herein. The changes made are in bold, but do not include the
7 headings and subheadings herein. All other terms of the Settlement not amended herein shall
8 remain in full force and effect. The amendments stated herein are incorporated in the Agreement
9 by this reference:

10 **SECTION I(E) is hereby amended to state:**

11 E. “Class Counsel” means Kashif Haque, Jessica L. Campbell, Samuel A. Wong,
12 and Kristy Connolly of AEGIS LAW FIRM, PC, and Bevin Allen Pike of CAPSTONE LAW
13 APC.

14 **SECTION I(DD) is hereby amended to state:**

15 DD. “Released PAGA Claims” means all claims for **PAGA** penalties arising during
16 the PAGA Period that were or could have reasonably been alleged based upon the facts pleaded
17 in the Actions and the PAGA notices that Named Plaintiffs provided to the LWDA.

18 **SECTION II, lines 5-13 of page 11, is hereby amended to delete the language calling**
19 **for the dismissal of the causes of action alleged against Defendants in these Actions**
20 **and instead the section states as follows:**

21 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and among the Named
22 Plaintiffs on behalf of the Class Members on the one hand, and Defendant on the other hand, and
23 subject to the approval of the Superior Court, that the causes of action alleged against Defendant
24 in these Actions are hereby being compromised and settled pursuant to the terms and conditions
25 set forth in this Agreement.

26 **SECTION III(H)(5)(B) is hereby amended to state:**

27 (a) Within fifteen (15) calendar days of receiving the Database Report, the Settlement
28 Administrator shall mail the Notice to each Class Member in accordance with Paragraph

(III)(J)(4)(a).

SECTION III(H)(5)(D) is hereby amended to delete this section in its entirety.

SECTION III(C), lines 13:19-22, is hereby amended to insert the correct case number for Plaintiff Kim's separately-filed action as follows:

Additionally, Plaintiff Kim is not releasing the specific allegations alleged in her separate action filed against Defendant in Orange County Superior Court Case No. **30-2023-01353512-CU-OE-NJC** for the non-wage-and-hour related claims.

EXECUTION BY PARTIES AND COUNSEL

The Parties and their counsel hereby execute this Agreement.

Dated: August 7, 2024

DocuSigned by:

Insook Ellen Kim

E27F3CCCBA2D4FF...

INSOOK ELLEN KIM

Dated: _____, 2024

Plaintiff,
YAMA SAIDI

Dated: _____, 2024

Plaintiff,
JENNIFER CHOI

Dated: _____, 2024

By:
For Defendant,
HOAG MEMORIAL HOSPITAL
PRESBYTERIAN

1 (III)(J)(4)(a).

2 SECTION III(H)(5)(D) is hereby amended to delete this section in its entirety.

3 SECTION III(C), lines 13:19-22, is hereby amended to insert the correct case
4 number for Plaintiff Kim's separately-filed action as follows:

5 Additionally, Plaintiff Kim is not releasing the specific allegations alleged in her separate
6 action filed against Defendant in Orange County Superior Court Case No. **30-2023-01353512-**
7 **CU-OE-NJC** for the non-wage-and-hour related claims.

8
9 **EXECUTION BY PARTIES AND COUNSEL**

10 The Parties and their counsel hereby execute this Agreement.

11
12 Dated: _____, 2024

13 _____
14 Plaintiff,
INSOOK ELLEN KIM

15 Dated: 08/14/2024
16 _____, 2024

17 *Yama Saidi*
Yama Saidi (Aug 14, 2024 14:21 PDT)
18 Plaintiff,
19 YAMA SAIDI

20 Dated: 08/06/2024
21 _____, 2024

22 *Ji.*
Jennifer Choi (Aug 6, 2024 15:41 PDT)
23 Plaintiff,
24 JENNIFER CHOI

25 Dated: _____, 2024

26 _____
27 By:
28 For Defendant,
HOAG MEMORIAL HOSPITAL
PRESBYTERIAN

1 (III)(J)(4)(a).

2 SECTION III(H)(5)(D) is hereby amended to delete this section in its entirety.

3 SECTION III(C), lines 13:19-22, is hereby amended to insert the correct case
4 number for Plaintiff Kim's separately-filed action as follows:

5 Additionally, Plaintiff Kim is not releasing the specific allegations alleged in her separate
6 action filed against Defendant in Orange County Superior Court Case No. **30-2023-01353512-**
7 **CU-OE-NJC** for the non-wage-and-hour related claims.

8
9 **EXECUTION BY PARTIES AND COUNSEL**

10 The Parties and their counsel hereby execute this Agreement.

11
12 Dated: _____, 2024

13 _____
14 Plaintiff,
INSOOK ELLEN KIM

15
16 Dated: _____, 2024

17 _____
18 Plaintiff,
YAMA SAIDI

19 Dated: _____, 2024

20 _____
21 Plaintiff,
JENNIFER CHOI

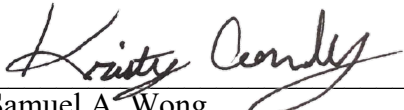
22 Dated: August 14th, 2024

23 
24 _____
25 By: Michael Krug, CHRO
26 For Defendant,
27 HOAG MEMORIAL HOSPITAL
28 PRESBYTERIAN

1 **APPROVED AS TO FORM:**

2
3 Date: August 14, 2024

AEGIS LAW FIRM, PC

4
5 By: 
6 Samuel A. Wong
7 Kashif Haque
8 Jessica L. Campbell
9 Kristy R. Connolly
10 Attorneys for Plaintiffs
11 YAMA SAIDI and JENNIFER CHOI

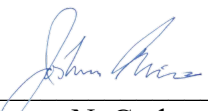
12
13
14 Date: _____, 2024

CAPSTONE LAW APC

15
16
17 By: _____
18 Bevin Allen Pike
19 Attorneys for Plaintiff
20 INSOOK ELLEN KIM

21
22 Dated: August 14, 2024

GODES & PREIS, LLP

23
24 By: 
25 James N. Godes
26 Joshua R. Mino
27 Attorneys for Defendant
28 HOAG MEMORIAL HOSPITAL
PRESBYTERIAN

1 **APPROVED AS TO FORM:**

2
3 Date: _____, 2024

AEGIS LAW FIRM, PC

4
5 By: _____
6 Samuel A. Wong
7 Kashif Haque
8 Jessica L. Campbell
9 Kristy R. Connolly
10 Attorneys for Plaintiffs
11 YAMA SAIDI and JENNIFER CHOI

12
13 Date: August 7, 2024

CAPSTONE LAW APC

14 By: Bevin Allen Pike
15 Bevin Allen Pike
16 Attorneys for Plaintiff
17 INSOOK ELLEN KIM

18 Dated: _____, 2024

GODES & PREIS, LLP

19
20 By: _____
21 James N. Godes
22 Joshua R. Mino
23 Attorneys for Defendant
24 HOAG MEMORIAL HOSPITAL
25 PRESBYTERIAN
26
27
28