

1. A judgment, decree, or order was entered in this action on *(date)*: August 9, 2024
2. A copy of the judgment, decree, or order is attached to this notice.

Date: August 13, 2024

|                        |                                     |          |                          |                         |
|------------------------|-------------------------------------|----------|--------------------------|-------------------------|
| (TYPE OR PRINT NAME OF | <input checked="" type="checkbox"/> | ATTORNEY | <input type="checkbox"/> | PARTY WITHOUT ATTORNEY) |
|------------------------|-------------------------------------|----------|--------------------------|-------------------------|

meg Razi

(SIGNATURE)

# **EXHIBIT A**

# 31515853

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*Attorneys for Defendant*

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

RUBEN ALVARADO, individually, and on  
behalf of other members of the general public  
similarly situated; WHITEY DAVIS,  
individually, and on behalf of other members  
of the general public similarly situated and on  
behalf of other aggrieved employees pursuant  
to the California Private Attorneys General  
Act;

Plaintiffs,

vs.

CITADEL SERVICING CORPORATIONS, a  
California corporation; and DOES 1 through  
100, inclusive  
Defendants.

Case No.: 30-2019-01057617-CU-OE-CXC

Honorable Lon F. Hurwitz  
Department CX-103

**CLASS ACTION**

**JOINT STIPULATION TO AMEND  
FINAL ORDER AND JUDGMENT;  
[REDACTED] ORDER THEREON**

**FILED**

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

**AUG 09 2024**

DAVID H. YAMASAKI, Clerk of the Court

BY: \_\_\_\_\_, DEPUTY

JOINT STIPULATION TO AMEND FINAL ORDER AND JUDGMENT; [REDACTED] ORDER THEREON

1 Plaintiffs Ruben Alvarado and Whitney Davis ("Plaintiffs") and Defendant Citadel  
2 Serving Corporation ("Defendant") (collectively, the "Parties"), by and through their respective  
3 counsel of record, hereby stipulate and request as follows:

4 **WHEREAS**, on March 18, 2019, Plaintiff Ruben Alvarado ("Plaintiff Alvarado")  
5 initiated this action by filing a Complaint for Damages, thereby commencing his class action  
6 against Defendant, Citadel Servicing Corporation, entitled *Ruben Alvarado v. Citadel Servicing*  
7 *Corporation*, in the Superior Court of California, County of Orange, Case No. 30-2019-  
8 01057617-CU-OE-CXC.

9 **WHEREAS**, on March 3, 2021, Plaintiff Alvarado filed the First Amended Class Action  
10 Complaint for Damages & Enforcement Under the Private Attorneys General Act, Cal Labor  
11 Code § 2698, *Et Seq.* for civil penalties, adding named Plaintiff Whitey Davis ("Plaintiff Davis")  
12 and a claim for unpaid penalties for alleged violations under PAGA.

13 **WHEREAS**, on August 16, 2023, the Court entered the Final Approval Order and  
14 Judgment, thereby granting final approval of the settlement of the Action reached by Plaintiff  
15 Alvarado and Plaintiff Davis (together "Plaintiffs") and Defendant Citadel Servicing Corporation  
16 ("Defendant") in accordance with the Stipulation of Settlement and Amendment No. 1 To  
17 Stipulation of Settlement (collectively, "Settlement," "Agreement," or "Settlement Agreement"),  
18 which, together with the exhibits annexed thereto, set forth the terms and conditions for  
19 settlement of the Action.

20 **WHEREAS**, on July 23, 2024, the Declaration of Jennifer Beliveau Regarding  
21 Compliance ("Compliance Declaration") was submitted for filing in the Action.

22 **WHEREAS**, on December 20, 2023, Simpluris issued Individual Settlement Payments to  
23 the six hundred and thirty-four (634) Settlement Class Members consisting of both the Non-  
24 Exempt Class Members and salaried Class Members (Compliance Declaration, ¶3).

25 **WHEREAS**, the check cashing period expired on June 17, 2024, which is one hundred  
26 eighty (180) calendar days from the issuance date of December 20, 2023 (*Id.*, ¶ 5).

27 **WHEREAS**, as of July 22, 2024, there were ninety-eight (98) settlement checks that  
28 were not cashed, deposited, or otherwise negotiated, and the associated remaining amount of

1 funds for those check is \$34,147.35 (*Id.* ¶ 8).

2       **WHEREAS**, pursuant to the Settlement Agreement, checks issued to Settlement Class  
3 Members are voided on the 181<sup>st</sup> day after mailing. The funds associated with the Individual  
4 Settlement Payments that have not been cashed, deposited, or otherwise negotiated within the  
5 180-day period shall be transmitted to the Community Legal Aid SoCal.

6       **WHEREAS**, on June 28, 2024, Simpluris issued a check in the amount of \$34,147.35 to  
7 Community Legal Aid SoCal, which was the remaining amount of funds associated with the  
8 ninety-eight (98) settlement checks that had not been cashed, deposited, or otherwise negotiated  
9 (*Id.* ¶ 8).

10       **THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY THE PARTIES**  
11 **THROUGH THEIR COUNSEL OF RECORD, THAT THE COURT SHALL ENTER AN**  
12 **ORDER AMENDING THE FINAL APPROVAL ORDER AND JUDGMENT AS**  
13 **FOLLOWS:**

14       1. The Court approves Simpluris' payment of \$34,147.35 to Community Legal Aid  
15 SoCal, representing the value of the ninety-eight (98) settlement checks that have not been  
16 cashed, deposited, or otherwise negotiated.

17       2. After entry of this Amendment to Final Approval Order and Judgment, pursuant  
18 to California Code of Civil Procedure, Plaintiff shall submit the herein Joint Stipulation to  
19 Amend Final Approval Order and Judgment to the Judicial Council.

20 **IT IS SO STIPULATED.**

21 Date: August 8, 2024

**LAWYERS FOR JUSTICE**

*Meg Razi*

By: \_\_\_\_\_

Joanna Ghosh  
Meg Razi  
Attorneys for Plaintiffs and the Class

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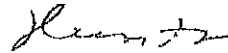
3 Dated August 8, 2024

PROTECTION LAW GROUP, LLP

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Heather Davis

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Amir Nayebdadash

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*Attorneys for Plaintiffs and the Class*

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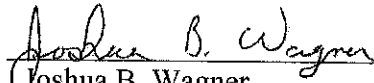
12 Dated: August 8, 2024

GORDON & REES SCULLY  
MANSUKHANI

13

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By:



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Joshua B. Wagner

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Mollie M. Burks

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*Attorneys for Defendant*

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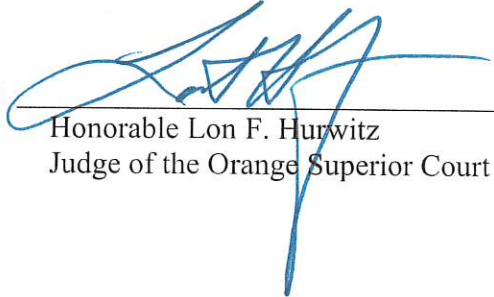
~~PROPOSED~~ ORDER

The Court, having reviewed the Parties' Joint Stipulation for an Order amending the Final Approval Order and Judgment, orders as follows:

1. The Parties' Joint Stipulation is approved.
2. Simpluris' payment of \$34,147.35 to Community Legal Aid SoCal, representing the value of the ninety-eight (98) settlement checks that have not been cashed, deposited, or otherwise negotiated, is approved.
3. After entry of this Joint Stipulation to Amend Final Approval Order and Judgment, pursuant to California Code of Civil Procedure, Plaintiff shall submit the herein Joint Stipulation to Amend Final Approval Order and Judgment to the Judicial Council.

IT IS SO ORDERED.

Dated: AUG 09 2024

By: 

Honorable Lon F. Hurwitz  
Judge of the Orange Superior Court

**PROOF OF SERVICE**

*STATE OF CALIFORNIA, COUNTY OF LOS ANGELES*

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 410 West Arden Avenue, Suite 203, Glendale, California 91203.

On August 13, 2024, I served the foregoing document(s) described as:

• **NOTICE OF ENTRY OF JUDGMENT OR ORDER**

on interested parties in this action as follows:

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**[X] BY E-MAIL**

The above-referenced documents were transmitted to the person(s) at the e-mail addresses listed herein by agreement of the person(s) listed at their most recent known e-mail address or e-mail of record in this action. I did not receive, within reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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State of California, Labor & Workforce Development Agency Web URL:  
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

**[X] BY ONLINE SUBMISSION**

The foregoing documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(l). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**[X] STATE**

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 13, 2024, at Glendale, California.



Deven Launchbaugh