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Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SONOMA
UNLIMITED CIVIL JURISDICTION

ROSA LINDA PEDONE,

Plaintiff,

-v-

LOWE'S HOME CENTERS, LLC; DOES 1-
10, inclusive,

Defendants.

No. SCV-265304

AGREEMENT RE LABOR CODE
PRIVATE ATTORNEYS GENERAL
ACT (PAGA) CAUSE OF ACTION

Plaintiff Rosa Linda Pedone and defendant Lowe's Home Centers, LLC, hereby agree: (1) the sixth cause of action under the Labor Code Private Attorneys General Act (PAGA) in the first amended complaint in the present action shall be dismissed without prejudice; (2) the statute of limitations on plaintiff's refiling the PAGA cause of action in a new action shall be tolled from the date the PAGA cause of action is considered to have been filed in the present action for purposes of the statute of limitations through September 16, 2020, when plaintiff filed a new PAGA action, *Pedone v. Lowe's Home Centers, LLC, et al., Sonoma Superior Court No. SCV-267074*; (3) the tolling provided by this Agreement is in addition to any tolling allowed by law for the time period up until the date the PAGA cause of action is considered to have been filed in the present action for purposes of the statute of limitations; and (4) this Agreement shall go into effect if and only if the Court issues an Order approving it.

The Parties are entering into this Agreement so that Plaintiff Pedone's PAGA claim may be

1 included as an add on case to the recently coordinated proceedings, JCCP No. 5110, *The Lowe's*
2 *Wage and Hour Cases*.

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5 DATED: September 28, 2020

By Rosa Linda Pedone
Rosa Linda Pedone

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7 DATED: September 25, 2020

By Sandra H. Dermody
Sandra Dermody (Sep 25, 2020 16:06 EDT)

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9 Sandra H. Dermody, Senior Counsel for
10 Lowe's Companies, Inc., on behalf of
11 Lowe's Home Centers, LLC
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