

1 ARMOND M. JACKSON, SBN 281547
2 ajackson@jacksonapc.com
3 ANDREA FERNANDEZ. SBN 295924
4 afernandez@jacksonapc.com
5 **JACKSON APC**
6 2 Venture Plaza, Ste. 240
7 Irvine, CA 92618
8 Phone (949) 281-6857
9 Fax (949) 777-6218

10 Attorneys for Plaintiff Katheryn Enriquez

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

13 KATHERYN ENRIQUEZ, as individuals and on)
14 behalf of other similarly situated employees,)

15 Plaintiff,

16 vs.

17 VINTAGE REAL ESTATE GROUP, INC., a)
18 California corporation, and DOES 1-50,)
19 inclusive,)

20 Defendants

CASE NO: 30-2020-01157744-CU-OE-CXC

) Assigned for all purposes to:

) Judge Peter Wilson

) Dept. CX102

) **DECLARATION OF ANDREA M.**
) **FERNANDEZ-JACKSON IN SUPPORT OF**
) **PLAINTIFF'S UNOPPOSED**
) **MEMORANDUM OF POINTS AND**
) **AUTHORITIES IN SUPPORT OF**
) **PLAINTIFF'S MOTION FOR ORDER**
) **PRELIMINARILY APPROVING CLASS**
) **ACTION SETTLEMENT**

) **Hearing Date: November 17, 2022**

) **Hearing Time: 2:00 p.m.**

) **Department: CX104**

) Case filed: August 28, 2020

) Trial date: February 27, 2023

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EXHIBIT A

RE: Katheryn Enriquez v. Vintage Real Estate Group, Inc. - Joint Statement

Andrea Fernandez <afernandez@jacksonapc.com>

Tue 10/18/2022 1:41 PM

To: Craig Sterling <Craig@karensloatlaw.com>; Armond Jackson <ajackson@jacksonapc.com>; Anthony Filer <afiler@jacksonapc.com>; Maria Ocampo <mocampo@jacksonapc.com>

Cc: Thai Hoang <thai@karensloatlaw.com>; Maria Espinoza <MariaEspinoza@karensloatlaw.com>; Chris Hellmich <chris@karensloatlaw.com>

Mr. Sterling, thank you for your reply.

This email Confirms that both Plaintiff and Defendant understand and agree that class action release is for the representative wage and claims only, and not any of the individual claims Ms. Enriquez alleged regarding her own claims for unlawful retaliation and termination. The proposed order is going to be very specific in the regard. I will also be attaching this email chain to my declaration, so that the Court is informed of this understanding. Please let me know if there is any disagreement to this, otherwise I will proceed.

Best,

JACKSON_{APC}

Andrea M. Fernandez-Jackson, Esq.

Direct: 949.200.7939 | afernandez@jacksonapc.com

2 Venture Plaza, Ste. 240

Irvine, California 92618

[949.281.6857](tel:949.281.6857) Main | [949.777.6218](tel:949.777.6218) Fax

www.jacksonapc.com

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From: [Craig Sterling](#)

Sent: Tuesday, October 18, 2022 1:33 PM

To: [Andrea Fernandez](#); [Armond Jackson](#); [Anthony Filer](#); [Maria Ocampo](#)

Cc: [Thai Hoang](#); [Maria Espinoza](#); [Chris Hellmich](#)

Subject: RE: Katheryn Enriquez v. Vintage Real Estate Group, Inc. - Joint Statement

Hi Andrea:

After reviewing the Settlement Agreement our client signed earlier this month and discussing the issues you raised in your email, we do not believe a revision is necessary. We think the current settlement agreement is straightforward regarding the claims released. Also, submitting it to our client again for another signature will unnecessarily delay the process. Therefore, we

ask that you please submit the Settlement Agreement in its current form. Should the court reject the settlement, we can revise it at that time.

Sincerely,



Craig A. Sterling
Senior Associate Attorney

Law Office of Karen J. Sloat, APC
42-600 Caroline Court, Suite 101
Palm Desert, CA 92211
Phone: 760-779-1313 | Fax: 760-340-4834
KarenSloatLaw.com

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From: Andrea Fernandez <afernandez@jacksonapc.com>
Sent: Tuesday, October 18, 2022 9:13 AM
To: Craig Sterling <Craig@karensloatlaw.com>; Armond Jackson <ajackson@jacksonapc.com>; Anthony Filer <afilr@jacksonapc.com>; Maria Ocampo <mocampo@jacksonapc.com>
Cc: Thai Hoang <thai@karensloatlaw.com>; Maria Espinoza <MariaEspinoza@karensloatlaw.com>
Subject: Re: Kathryn Enriquez v. Vintage Real Estate Group, Inc. - Joint Statement

Hi Craig, wanted to follow up on this.

JACKSON_{APC}

Andrea Fernandez-Jackson, Esq.

949.200.7939 Direct | afernandez@jacksonapc.com

2 Venture Plaza, Ste. 240

Irvine, California 92618

[949.281.6857](tel:949.281.6857) Main | [949.777.6218](tel:949.777.6218) Fax

www.jacksonapc.com

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From: Andrea Fernandez <afernandez@jacksonapc.com>

Sent: Friday, October 14, 2022 4:56 PM

To: Craig Sterling <Craig@karensloatlaw.com>; Armond Jackson <ajackson@jacksonapc.com>; Anthony Filer <afil@jacksonapc.com>; Maria Ocampo <mocampo@jacksonapc.com>

Cc: Thai Hoang <thai@karensloatlaw.com>; Maria Espinoza <MariaEspinoza@karensloatlaw.com>

Subject: Re: Kathryn Enriquez v. Vintage Real Estate Group, Inc. - Joint Statement

Hi Craig,

Our office was in the process of filing the approval motion and noticed that section 5.01 of the settlement agreement for release claims of the class state "Upon the Date of Finality, Plaintiffs and Participating Class Members who do not opt-out of the Settlement, release the Released Parties from, and will be forever barred from pursuing against the Released Parties, any and all claims, demands, rights, liabilities and causes of action alleged in Plaintiffs' Operative Complaints, and all claims for attorneys' fees and costs relating to the Released Claims by Class Members." This has to be modified to add specific claims for two reasons, we just had a motion denied by Judge Wilson for vague language, and two it can be viewed as releasing the retaliation and wrongful term claims in the complaint.

Here are the redline proposed changes. If you agree, we will send it off for execution by our client we need to get on file first thing next week. I appreciate your help and cooperation.

Best,

Andrea

JACKSON_{APC}

Andrea Fernandez-Jackson, Esq.

949.200.7939 Direct | afernandez@jacksonapc.com

2 Venture Plaza, Ste. 240

Irvine, California 92618

[949.281.6857](tel:949.281.6857) Main | [949.777.6218](tel:949.777.6218) Fax

www.jacksonapc.com

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From: Craig Sterling <Craig@karensloatlaw.com>

Sent: Thursday, October 6, 2022 5:36 PM

To: Andrea Fernandez <afernandez@jacksonapc.com>; Chris Hellmich <chris@karensloatlaw.com>; Armond Jackson <ajackson@jacksonapc.com>; Anthony Filer <afiler@jacksonapc.com>; Maria Ocampo <mocampo@jacksonapc.com>

Cc: Thai Hoang <thai@karensloatlaw.com>; Maria Espinoza <MariaEspinoza@karensloatlaw.com>

Subject: RE: Kathryn Enriquez v. Vintage Real Estate Group, Inc. - Joint Statement

Dear Ms. Fernandez-Jackson:

Attached is the signed Settlement Agreement we received from our client a few minutes ago.

Sincerely,



Craig A. Sterling

Senior Associate Attorney

Law Office of Karen J. Sloat, APC

42-600 Caroline Court, Suite 101
Palm Desert, CA 92211

Phone: 760-779-1313 | Fax: 760-340-4834

KarenSloatLaw.com

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