

This Addendum (“Addendum”) to the Joint Stipulation of Class Action and PAGA Representative Action Settlement and Release (“Settlement Agreement”) is made and entered into by Plaintiffs Fang Zhang and Ying Cao (“Plaintiffs”) and Defendant Panrosa Enterprises, Inc. (“Defendant”) pursuant to paragraph 13.15 of the Settlement Agreement, which provides that: “This Settlement may be amended or modified only by a written instrument signed the Parties or their successors-in-interest.”

This Addendum incorporates by reference all terms and conditions of the Settlement Agreement. But for those specific terms and conditions that this Addendum modifies, all Settlement terms and conditions will remain effective and enforceable. Any inconsistencies or differences between this Addendum and the Settlement will be interpreted and construed in favor of this Addendum.

1. The definition of “Released Claims” in paragraph 1.36 is replaced with, “those claims alleged in the operative PAGA letter, pending Complaint and forthcoming First Amended Complaint, or that reasonably could have been alleged based on the facts and claims asserted in the PAGA letter and/or Complaint and/or First Amended Complaint, and arising during the Class Period, including claims under Labor Code sections 226.8, 2775, 204, 210, 226(a), 226(e), 226.3, 226.7, 227.3, 201-203, 510, Section 12 of the applicable IWC Wage Order, as well as any civil penalty claims predicated on the claims alleged in Plaintiff’s PAGA letter and/or Complaint and/or First Amended Complaint under PAGA and arising during the Class and/or PAGA Period” (page 6).
2. The definition of “Released Parties” in paragraph 1.37 A is replaced with, “Defendant Panrosa Enterprises, Inc., together with their officers, directors, and employees” (page 6).

IT IS SO STIPULATED

IN WITNESS WHEREOF, the Parties have executed this Addendum on the date below their signatures or the signature of their representatives. The date of the Addendum shall be the date of the latest signature.

Date: 01 / 27 / 2022

Zhangfang

FANG ZHANG as an Individual, Class
Representative, and PAGA Representative

Date: 01 / 28 / 2022

Ying Cao

YING CAO as an Individual, Class
Representative, and PAGA Representative

Date: _____

On behalf of Panrosa Enterprises, Inc.

By: _____

Its : _____

Date: _____

FANG ZHANG as an Individual, Class
Representative, and PAGA Representative

Date: _____

YING CAO as an Individual, Class
Representative, and PAGA Representative

Date: 1/27/2022

DocuSigned by:


On behalf of Panrosa Enterprises, Inc.
By: Mischella Mack
Its : Director of Human Resources