

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Anthony J. Orshansky, Cal. Bar No. 199364
CounselOne, P.C.
9301 Wilshire Boulevard, Suite 650
Beverly Hills, California 90210
Tel: (310) 277-9945 / Fax: (424) 277-3727

Attorneys for Plaintiff

Ryan D. McCortney (SBN 132194)
Matthew M. Sonne (SBN 239110)
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
650 Town Center Drive, 10th Floor
Costa Mesa, California 92626
Tel: (714) 513-5100 / Fax: (714) 513-5130

Attorneys for Defendant

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

KRISTA OZUNA, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

CMRE FINANCIAL SERVICES, INC., a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 30-2019-01087365-CU-OE-CXC

Honorable William D. Claster
Department CX104

CLASS ACTION

**AMENDMENT TO CLASS ACTION AND
PAGA SETTLEMENT AGREEMENT
AND STIPULATION (Related to ROA
#64)**

Reservation Number: 73429309

Complaint Filed: August 1, 2019
Trial Date: None Set

1 **AMENDMENT TO CLASS ACTION AND PAGA SETTLEMENT AGREEMENT AND**
2 **STIPULATION**

3 Plaintiff Krista Ozuna (Plaintiff"), on behalf of herself others similarly situated, and CMRE
4 Financial Services, Inc. ("Defendant"), by and through their counsel of record, hereby stipulate as
5 follows, subject to court approval:

6 1. All terms referenced herein shall be defined as they are defined in the Class Action
7 And PAGA Settlement Agreement And Stipulation that was fully executed by the Parties in
8 September 2020.

9 2. Section 7 is amended to strike the words "related to" from the first sentence.

10 3. Section 41.a. is amended so workweek disputes are due "60 days" from the date of
11 mailing of the notice.

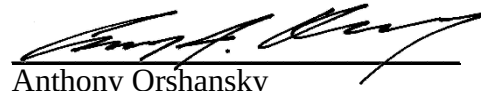
12 4. The following language is inserted into the Settlement Agreement as section 43.f:
13 "Application of PAGA Release to All Class Members. Regardless of whether a Class Member
14 serves a timely request for exclusion under this section, the Class Member will still be bound by the
15 release of all PAGA claims covered by this Settlement Agreement and will receive a pro rata portion
16 of the settlement fund allocated to that claim."

17 5. Section 45.b [sic] is amended to substitute "Public Law Center of Orange County"
18 with "State Controller's Unclaimed Property Fund."

19 Dated: February 23, 2021

CounselOne, P.C.

21 By:

22 
23 Anthony Orshansky
24 Attorneys for Plaintiff

25 Dated: February 23, 2021

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

26 By:

27 
28 Ryan D. McCortney
Matthew M. Sonne
Attorneys for Defendant