

DAVID YEREMIAN & ASSOCIATES, INC.

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Attorneys for Plaintiff
JOHN PEHKONEN,
on behalf of himself and others similarly situated

[Additional counsel and party listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

JOHN PEHKONEN, on behalf of himself and
others similarly situated,

Plaintiff,

v.

BUREAU VERITAS COMMODITIES AND
TRADE INC. fka INSPECTORATE
AMERICAN CORPORATION, a Delaware
corporation; and DOES 1 through 50, inclusive

DEFENDANT.

Case No. 20STCV40104

ASSIGNED FOR ALL PURPOSES TO JUDGE
CAROLYN B. KUHL, DEPT. 12

**ADDENDUM TO THE JOINT STIPULATION
AND SETTLEMENT OF CLASS ACTION
AND PAGA CLAIMS**

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BUREAU VERITAS COMMODITIES AND TRADE, INC.

fka INSPECTORATE AMERICAN CORPORATION

1 This Addendum to Joint Stipulation of Class Action and PAGA Settlement (“Addendum”) is
2 made and entered into by and between Plaintiff JOHN PEHKONEN (“**Class Representative**”),
3 individually and on behalf of the alleged putative class of all other similarly situated individuals, on
4 the one hand, and Defendant BUREAU VERITAS COMMODITIES AND TRADE, INC.
5 fka INSPECTORATE AMERICAN CORPORATION (“**Defendant**”), on the other hand. Class
6 Representative and Defendant are jointly referred to in this Addendum as the “Settling Parties.” This
7 addendum modifies the Joint Stipulation of Class Action and PAGA Settlement (“Agreement”)
8 previously entered into by the Settling Parties in the above entitled action and which is attached as
9 Exhibit 1 to the Declaration of David Yeremian In Support of Motion for Preliminary Approval of
10 the Class Action Settlement filed on March 29, 2022.

11 The Settling Parties agree to modify the terms of the Agreement as follows:

12 **The following adds sentence at the end of paragraph 60 in section IX:**

13 If a Notice Packet needs to be re-mailed then that individual Class Member will be provided
14 fifteen (15) additional days to object or request exclusion from the settlement from the date of re-
15 mailing or until the original deadline for postmarking an opt-out, whichever is later.

16 **The following adds sentence at the end of paragraph 64 in section IX:**

17 To be timely, all disputes must be postmarked no later than thirty (30) calendar days
18 following the date of the first mailing of the Notice by the Settlement Administrator (“**Dispute**
19 **Deadline**”).

20 Other than as expressly modified herein, all provisions of the Agreement remain in effect
21 and apply to this Addendum.

22 IT IS SO AGREED:

1 Dated: June 17, 2022

John Pehkonen, on behalf of herself and all
others similarly situated

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3
4 By:  DocuSigned by:
DocuSign Envelope
4840F1B89E4C4D6...
John Pehkonen

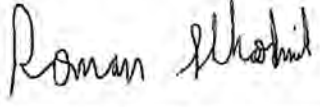
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6 Dated: June 16, 2022

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8 By: 
9 For: BUREAU VERITAS
10 COMMODITIES AND TRADE, INC. fka
INSPECTORATE AMERICAN
CORPORATION
Alan Sikarskie - VP/COO

11 APPROVED AS TO FORM:

12
13 Dated: June 17, 2022

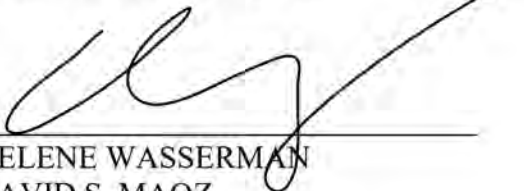
DAVID YEREMIAN & ASSOCIATES, INC.

14
15 By: 
16 ROMAN SHKODNIK
Attorneys for PLAINTIFF

17 APPROVED AS TO FORM:

18
19 Dated: June 17, 2022

LITTLER MENDELSON, P.C.

20
21 By: 
22 HELENE WASSERMAN
23 DAVID S. MAOZ
Attorneys for Defendant