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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JOCELYN TRIGUEROS, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

STANFORD FEDERAL CREDIT UNION, an
unknown business entity; CARDTRONICS
USA, INC., a Delaware corporation; ATM
NATIONAL, LLC d/b/a ALLPOINT
NETWORK, a Delaware limited liability
company; and DOES 1 through 100, inclusive;

Defendants.

Case No.: 21CV375168

Assigned for All Purposes to:
Honorable Sunil R. Kulkarni
Department 1

CLASS ACTION

**PLAINTIFF'S SUPPLEMENTAL BRIEF
IN SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); and Amended
[Proposed] Order filed concurrently
herewith]

Hearing Date: March 16, 2023
Hearing Time: 1:30 p.m.
Hearing Place: Department 1

Complaint Filed: January 8, 2021
Trial Date: None Set

Plaintiff Jocelyn Trigueros (“Plaintiff”) provides this supplemental submission in response to the Court’s tentative ruling on Plaintiff’s Motion for Preliminary Approval of Class Action Settlement scheduled for hearing on March 16, 2023. On March 7, 2023, prior to the scheduled preliminary approval hearing, the Court issued a tentative ruling ordering Plaintiff and Defendant Stanford Federal Credit Union (“Defendant”) to make changes to the Joint Stipulation and Settlement Agreement (“Settlement Agreement”) and Notice of Class Action and PAGA Settlement (“Notice”).

The chart below lists each of the Court’s issues from the tentative ruling and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
Release language In the Settlement Agreement	The Settlement Agreement has been modified accordingly. (Supplemental Declaration of Douglas Han in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 4; Exhibit 2, §§ I(CC), I(HH), III(K), III(L), III(M).)
Release language in the Notice	The Notice has been modified accordingly. (Supp Han Decl., <i>supra</i> , at ¶ 5; Exhibit 3, <i>supra</i> , at §§ 9(A), 9(B).)
The Court will hear and consider objections to the PAGA portion of the settlement.	The Notice has been modified accordingly. (Supp Han Decl., <i>supra</i> , at ¶ 6; Exhibit 3, <i>supra</i> , at §§ 3, 7.)

1 **Instructions for Class Members to remotely**
2 **appear at the Final Approval Hearing**

The Notice has been modified accordingly.

(Supp Han Decl., *supra*, at ¶ 7; Exhibit 3,
supra, at § 12.)

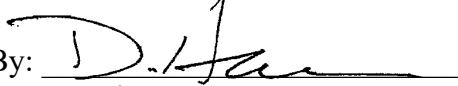
5 **Notice has been made more streamlined**
6 **and easily understandable for Class**
7 **Members.**

The Notice has been modified accordingly.

(Supp Han Decl., *supra*, at ¶ 8; Exhibit 3,
supra, at §§ 1, 2, 5, 6.)

10 Dated: March 10, 2023

JUSTICE LAW CORPORATION

By: 

Douglas Han

Attorneys for Plaintiff

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PROOF OF SERVICE