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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF SANTA CLARA**

JULIO TESCHERA, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

GAWFCO ENTERPRISES, INC., a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 21CV376213

**ADDENDUM TO JOINT STIPULATION OF  
CLASS ACTION SETTLEMENT**

1                   **ADDENDUM TO JOINT STIPULATION OF CLASS ACTION SETTLEMENT**

2                   This Addendum to Joint Stipulation of Class Action Settlement (“Addendum”) is made  
3 and entered into by and between counsel for Plaintiff Julio Teschera (“Teschera” or “Plaintiff”)  
4 and Defendant Gawfco Enterprises, Inc. (“Defendant”) (collectively, the “Parties”), pursuant to  
5 Section 74 of the Joint Stipulation of Class Action Settlement (“Agreement”) which states that  
6 “[t]his Agreement may be amended or modified only by a written instrument signed by the  
7 Parties’ counsel.”

8                   The Parties hereby amend the Agreement as follows:

- 9                   •       Section 45(g) is amended to read as follows: Calculating Participating Class  
10                   Members settlement share, fielding inquiries from Class Members, and  
11                   administration of any Requests for Exclusion. This service will include  
12                   settlement proceed calculations, printing and issuance of checks, and preparation  
13                   of 1099 and W2 Forms.
- 14                   •       Section 59 is amended to read as follows: All Individual Settlement Payments  
15                   shall be allocated as follows: 80% as penalties and interest and 20% as wages.  
16                   The amount of penalty and interest payments shall be reported on an IRS Form  
17                   1099 and the amount of wages shall be reported on an IRS Form W2 by the  
18                   Settlement Administrator.

19                   IT IS SO STIPULATED AND AGREED.

20                   DATED: March 23, 2022

21                   **POLARIS LAW GROUP, P.C.**

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24                   William L. Marder  
25                   Attorneys for Plaintiff and the Class

26                   DATED: March 23, 2022

27                   **HYUN LEGAL, APC**

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Dennis S. Hyun  
Attorneys for Plaintiff and the Class

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DATED: March 23, 2022

RAMSEY LAW GROUP  
By:   
HUSSEIN SAFFOURI  
Attorneys for Plaintiffs Gawfco Enterprises,  
Inc.