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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

SALLY PORTER, individually, and on behalf
of other members of the general public similarly
situated,

Plaintiff,

vs.

INDIAN HILL MANAGEMENT, INC., a
California corporation; WEBB FAMILY
ENTERPRISES, INC., a California corporation;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: CIVSB2026788

**AMENDMENT TO THE JOINT
STIPULATION OF CLASS ACTION
SETTLEMENT AND RELEASE**

**AMENDMENT TO THE JOINT STIPULATION OF
CLASS ACTION AND PAGA SETTLEMENT AND RELEASE**

This amendment (“Amendment”) to the Joint Stipulation of Class Action Settlement and Release (“Settlement Agreement”) is made and entered into by and between Plaintiff Sally Porter (“Plaintiff” or “Class Representative”), as an individual and on behalf of the proposed Settlement Class, and Defendants Indian Hill Management, Inc., Webb Family Enterprises, Inc., Kiaco, Inc., 05619, Inc., and 36733, Inc. (“Defendants”) (collectively with Plaintiff, the “Parties”), pursuant to Paragraph 73 of the Settlement Agreement, which provides: “No amendment, change, or modification to this Settlement Agreement will be valid unless in writing and signed, either by the Parties or their counsel, and approved by the Court.”

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

Amended Paragraph 33—Funding of the Gross Settlement Amount. Defendants will deposit of the Gross Settlement Amount of Two Million Seven Hundred Fifty Thousand Dollars (\$2,750,000) in two (2) separate installments into a Qualified Settlement Account to be established by the Settlement Administrator. The first installment of Five Hundred Thousand Dollars (\$500,000) will be made by December 31, 2023. The second installment of Two Million Two Hundred Fifty Thousand Dollars (\$2,250,000) will be made by February 29, 2024. Defendants will pay the employer’s share of payroll taxes separately from the Gross Settlement Amount, and concurrently with the second installment. After the Effective Date, the Gross Settlement Amount will be used for: (a) Individual Settlement Payments; (b) the Labor and Workforce Development Agency Payment; (c) the Class Representative Enhancement Payment; (d) Attorneys’ Fees and Costs; and (e) Settlement Administration Costs.

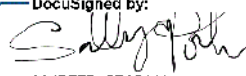
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IT IS SO STIPULATED.

PLAINTIFF

Dated: 1/9/2024

DocuSigned by:

224BF7D15E9544A...

DEFENDANT

Dated: _____

[Name of Authorized Signatory]
Indian Hill Management, Inc.

DEFENDANT

Dated: _____

[Name of Authorized Signatory]
Webb Family Enterprises, Inc.

DEFENDANT

Dated: _____

[Name of Authorized Signatory]
Kiaco, Inc.
DEFENDANT

Dated: _____

[Name of Authorized Signatory]
05619, Inc.

DEFENDANT

Dated: _____

[Name of Authorized Signatory]
36733, Inc.

1 IT IS SO STIPULATED.

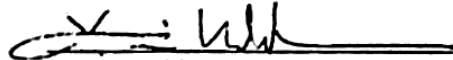
2 PLAINTIFF

3 Dated: 12-21-23

4 Sally Porter

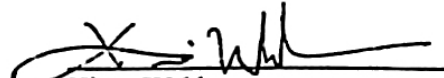
5 DEFENDANT

6 Dated: 12-21-23

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8 Kiana Webb
9 Indian Hill Management, Inc.

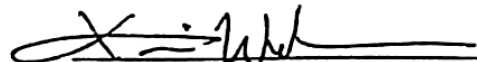
10 DEFENDANT

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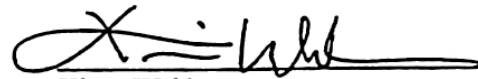
12 
13 Kiana Webb
14 Webb Family Enterprises, Inc.

15 DEFENDANT

16 Dated: 12-21-23

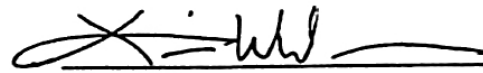
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18 Kiana Webb
19 Kiaco, Inc.
20 DEFENDANT

21 Dated: 12-21-23

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23 Kiana Webb
24 05619, Inc.

25 DEFENDANT

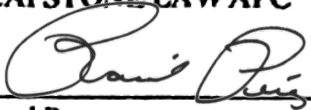
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36733, Inc.

APPROVED AS TO FORM

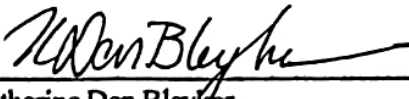
CAPSTONE LAW APC

Dated: 1/9/24

By: 
Raul Perez
Attorneys for Plaintiff, Sally Porter

O'HAGAN MEYER LLP

Dated: 12-21-23

By: 
Katherine Den Bleyser
Attorneys for Defendants, Indian Hill Management,
Inc., Webb Family Enterprises, Inc., Kiaco, Inc.,
05619, Inc., and 36733, Inc.