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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

GRICELDA LOPEZ, an individual, on behalf
of herself and others similarly situated,

Plaintiff,

vs.

KAAB, INC., a California corporation;
SOPHIE’S RB LLC d/b/a RIVIERA HOUSE,
a California limited liability company; and 610
AVENIDA VICTORIA RESTAURANT, LLC
d/b/a PIERSIDE KITCHEN + BAR, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 21STCV28238

*Assigned for all purposes to: Hon. Richard J.
Burdge Jr., Dept. 37*

**FIRST AMENDMENT TO JOINT
STIPULATION OF PAGA ACTION
SETTLEMENT AND RELEASE OF
CLAIMS**

1 This First Amendment to the Joint Stipulation of PAGA Settlement and Release of Claims is
2 made and entered into by and between Plaintiff GRICELDA LOPEZ ("Plaintiff" or "PAGA
3 Representative"), individually and on behalf of all putative class members, and Defendants KAAB,
4 INC., SOPHIE'S RB LLC d/b/a RIVIERA HOUSE, and 610 AVENIDA VICTORIA
5 RESTAURANT, LLC d/b/a PIERSIDE KITCHEN + BAR ("Defendants"). Plaintiff and
6 Defendants are collectively referred to herein as "the Parties."

7
8 **RECITALS**

9 1. **WHEREAS**, Plaintiff and Defendants entered into a Joint Stipulation and Settlement
10 Agreement (the "Settlement Agreement") on or about November 12, 2021.

11 2. **WHEREAS**, the Settlement Agreement defines the "PAGA Period" as "the period
12 of time commencing on April 23, 2020, and ending on the date of approval of the settlement by the
13 Court."

14 3. **WHEREAS**, the PAGA Members are defined as all current and former hourly-paid,
15 non-exempt employees who were employed by Defendants in the state of California at any time
16 during the PAGA Period.

17 4. **WHEREAS**, the Parties wish to limit the PAGA Period in order to better reflect the
18 negotiated pay periods at issue.

19 5. **WHEREAS**, Paragraph 57 of the Settlement Agreement provides that "The
20 Settlement Agreement may be amended or modified only by a written instrument signed by counsel
21 for all Parties or their successors-in-interest and approved by the Court."

22 6. **WHEREAS**, Counsel whose signatures appear below represent and warrant that
23 they are authorized by the Parties whom they represent to negotiate and enter into this Amendment
24 as set forth in the Settlement Agreement.

25 **NOW, THEREFORE**, the Parties hereby agree to amend and modify the Settlement
26 Agreement as follows:
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1 1. Paragraph 5 of the Settlement Agreement shall be revised to state: "The 'PAGA
2 Period' shall mean the period in time commencing on April 23, 2020, and ending on August 2,
3 2021."

4 2. The proposed notice attached to the Settlement Agreement as Exhibit A shall be
5 amended to reflect the revised PAGA Period.
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9 DATED: 2/11/2022

PROTECTION LAW GROUP LLP

10
11 By: 

Heather Davis, Esq.

12
13 Attorney for Defendants

14 DATED: 02/11/2022 21:47 UTC

**LAWYERS FOR EMPLOYEE AND
CONSUMER RIGHTS**

15
16
17 By: 

Edith Alvarez, Esq.

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19 Attorneys for Plaintiff.
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1. Edith Alvarez (ealvarez@lfecr.com)

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