

BIBIYAN LAW GROUP P.C.

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Attorneys for Plaintiffs, MANUEL HERNANDEZ
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of themselves and all others similarly situated,

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

MANUEL HERNANDEZ and MARIA R.
CASTILLO VICARIO, on behalf of
themselves and all others similarly situated and
aggrieved,

Plaintiffs,

v.

THIBIANT INTERNATIONAL, INC., a
California corporation; LEGENDARY
STAFFING, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 21STCV22067

[Assigned to the Hon. Samantha P. Jessner in
Dept. 7]

**JOINT STIPULATION FOR THE COURT
TO ENTER JUDGMENT; AND
[PROPOSED] JUDGMENT**

Action Filed: June 11, 2021
Trial Date: None Set

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Counsel for Defendant Thibiant International, Inc.

1 Plaintiffs Manuel Hernandez (“Plaintiff Hernandez”), and Maria R. Castillo Vicario
2 (“Plaintiff Castillo” and collectively, “Plaintiffs”), on the one hand, and defendant Thibiant
3 International, INC. (“Defendant Thibiant”), on the other hand, by and through their respective
4 counsel of record, hereby jointly agree and stipulate as follows:

5 **WHEREAS**, on or around February 20, 2026, Plaintiffs filed the Motion for Final Approval
6 of Class Action and Paga Settlement Agreement (“Motion”), along with a [Proposed] Order and a
7 [Proposed] Judgment;

8 **WHEREAS**, on March 16, 2026, the Court held a hearing on the Motion, set a Non-
9 Appearance Case Review re: Administration for January 20, 2027 at 9:00 a.m., with the
10 Administrator’s Declaration due January 13, 2027, and ordered Plaintiffs and Defendant (the
11 “Parties”) to submit a revised Proposed Order incorporating these updates;

12 **WHEREAS**, on or around March 16, 2026, Plaintiffs filed the revised Proposed Order with
13 the Court with the changes indicated at the March 16, 2026, hearing, but did not file a revised
14 Proposed Judgment, as no changes from the February 20, 2026 version were necessary;

15 **WHEREAS**, on March 18, 2026, the Court entered the Amended [Proposed] Order granting
16 Plaintiffs’ Motion, however, the Court has yet to enter the [Proposed] Judgment filed on February
17 20, 2026.

18 **NOW THEREFORE**, the Parties stipulate and respectfully request:

- 19 (1) The Court enter the [Proposed] Judgment filed on February 20, 2026, a copy
20 of which is attached hereto as Exhibit 1.

21 Dated: May 7, 2026

BIBIYAN LAW GROUP, P.C.

23 BY: /s/ Brandon M. Chang
24 BRANDON M. CHANG
25 Attorneys for Plaintiffs, MANUEL
26 HERNANDEZ and MARIA R. CASTILLO
27 VICARIO, on behalf of themselves and all others
28 similarly situated.

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Dated: May 7, 2026

BLANK ROME LLP

BY: /s/ Caroline P. Donelan
CAROLINE P. DONELAN
Attorneys for Defendant THIBIAN
INTERNATIONAL, INC.

EXHIBIT 1

BIBIYAN LAW GROUP, P.C.

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Attorneys for Plaintiffs, MANUEL HERNANDEZ

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of themselves and all others similarly situated

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Defendants.

CASE NO.: 21STCV22067

[Assigned to the Hon. Samantha P. Jessner in
Dept. 7]

[PROPOSED] JUDGMENT

1 **JUDGMENT**

2 Pursuant to the Order Granting Final Approval of the Class and Representative Action
3 Settlement, it is hereby **ORDERED, ADJUDGED AND DECREED** as follows:

4 1. Judgment in this matter is entered in accordance with the Court’s Order Granting Motion
5 for Final Approval of Class and Representative Action Settlement (“Order Granting Final
6 Approval”) and the parties’ Class Action and PAGA Settlement Agreement (“Settlement,”
7 “Agreement” or “Settlement Agreement”). All terms used herein shall have the same meaning as
8 defined in the Settlement Agreement.

9 2. The “Settlement Class” (“Settlement Class Members” or “Class Members”) means all
10 persons currently or formerly directly employed by defendant Thibiant International, Inc.
11 (“Defendant Thibiant”), as hourly-paid, non-exempt in California at any time during the period from
12 March 1, 2021 through October 24, 2022 (“Class Period”).

13 3. “Aggrieved Employees” means all persons currently or formerly directly employed by
14 Defendant Thibiant, as non-exempt, hourly-paid employees in California at any time during the
15 period from June 21, 2020 through the end of the Class Period (“PAGA Period”).

16 4. Zero (0) Class Members opted out of the Settlement and zero (0) Class Members
17 objected to the Settlement.

18 5. Defendant Thibiant shall fully fund the Gross Settlement Amount, and also fund the
19 amounts necessary to fully pay Defendant Thibiant’s share of employer-side payroll taxes owed on
20 the Wage Portion of the Individual Class Payments by transmitting the funds to the Administrator
21 no later than 14 days after the Effective Date.

22 6. Within 7 days after Defendant Thibiant funds the Gross Settlement Amount, the
23 Administrator will mail checks for all Individual Class Payments, all Individual PAGA Payments,
24 the LWDA PAGA Payment, the Administration Expenses Payment, the Class Counsel Fees
25 Payment, the Class Counsel Litigation Expenses Payment, and the Class Representative Service
26 Payment. Disbursement of the Class Counsel Fees Payment, the Class Counsel Litigation Expenses
27 Payment and the Class Representative Service Payment shall not precede disbursement of Individual
28 Class Payments, and the Individual PAGA Payments.

1 7. For any Class Member whose Individual Class Payment check or Individual PAGA
2 Payment check is uncashed and cancelled after the void date, the Administrator shall transmit the
3 funds represented by such checks to the California Controller's Unclaimed Property fund in the
4 name of the Class Member thereby leaving no "unpaid residue" subject to the requirements of
5 California Code of Civil Procedure Section 384.

6 8. Effective upon entry of Judgment, this Order, and on the date when Defendant Thibiant
7 fully fund the entire Gross Settlement Amount and fund all employer-side payroll taxes owed on
8 the Wage Portion of the Individual Class Payments, for the duration of the Class Period, all
9 Participating Class Members, on behalf of themselves and their respective former and present
10 representatives, agents, attorneys, heirs, administrators, successors, and assigns, release Released
11 Parties from all claims that were alleged, or reasonably could have been alleged, based on the facts
12 stated in the Class Action Operative Complaint including: (1) all claims for failure to pay overtime
13 wages; (2) all claims for failure to pay minimum wages; (3) all claims for failure to provide
14 compliant meal periods, or compensation in lieu thereof; (4) all claims for failure to provide
15 compliant rest periods, or compensation in lieu thereof (5) all claims for the failure to pay wages
16 due upon termination or resignation; (6) all claims for non-compliant wage statements; (7) all claims
17 for failure to timely pay wages; (8) all claims for failure to reimburse employees for business
18 expenses and (9) all claims asserted through California Business & Professions Code section 17200,
19 *et seq.* arising out of the Labor Code violations referenced in the Class Action Operative Complaint
20 (the "Released Class Claims").

21 9. Effective upon entry of this Judgment, the Order granting Final Approval of the
22 Settlement, and on the date when Defendant Thibiant fully fund the entire Gross Settlement Amount
23 and fund all employer-side payroll taxes owed on the Wage Portion of the Individual Class
24 Payments, for themselves and their respective former and present representatives, agents, attorneys,
25 heirs, administrators, successors, and assigns, the Released Parties from all claims for PAGA
26 penalties that were alleged, or reasonably could have been alleged, based on the facts stated in the
27 PAGA Action Operative Complaint and the PAGA Notice, including, claims for PAGA penalties
28 pursuant to Labor Code sections 210, 226.3, 558, 1174.5, 1197.1, and 2699 in connection with

1 alleged violations of Labor Code sections Labor Code sections 96, 98.6, 200, 201, 202, 203, 204,
2 226, 226.7, 227.3, 232, 232.5, 246 *et seq.*, 432, 510, 512, 1102.5, 1174, 1194, 1197, 2802, and
3 2810.5 (the “Released PAGA Claims”).

4 10. The “Released Parties” shall include: Defendant Thibiant and each of its former, present
5 and future owners, shareholders, parents, affiliates, and subsidiaries, and all of their current, former,
6 and future officers, directors, members, board and committee members, managers, employees,
7 consultants, partners, shareholders, affiliates, joint venturers, agents, mandatories, advisors,
8 predecessors, successors, assigns, accountants, lenders, equity or bond holders, insurers, reinsurers,
9 and/or legal representatives.

10 11. This document shall constitute a Judgment for purposes of California Rules of Court,
11 Rule 3.769(h).

12 **IT IS SO ORDERED, ADJUDGED AND DECREED.**

13 Dated: 05/11/2026
14



A handwritten signature in black ink, appearing to read "Samantha Jessner".

Samantha Jessner / Judge
Judge of the Superior Court

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my mailing address is 1460 Westwood Boulevard, Los Angeles, CA 90024.

On May 7, 2026, I caused a true and correct copy of the document(s) described as: **JOINT STIPULATION FOR THE COURT TO ENTER JUDGMENT; AND [PROPOSED] JUDGMENT**, to be served by electronic transmission to the below-referenced electronic email addresses as follows:

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Facsimile: 424.239.3434

Counsel for Defendant Thibiant International, Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 7, 2026, at Los Angeles, California.

/s/ Jennifer Echeverria
Jennifer Echeverria