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Attorneys for Plaintiff CAMISHA PASCASCIO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CAMISHA PASCASCIO, individually and on
behalf of other persons similarly situated,

Plaintiff,

vs.

**EPIC CONTRACT AND PERMANENT
PLACEMENT STAFFING, INC.**, a California
corporation; **MEK LONG BEACH, LLC**, a
California limited liability company; **NORWALK
SKILLED NURSING & WELLNESS CENTRE,
LLC**, a California limited liability company;
COUNTRY VILLA NURSING CENTER, INC.,
a California corporation; **PC CARE LLC**, a
California limited liability company; and **DOES 1-
50**,

Defendants.

Case No.: 21STCV26367

[Assigned for all purposes to the Honorable
David S. Cunningham, Dept. SS11]

CLASS ACTION

**THIRD STIPULATION RE
MODIFICATION OF CLASS ACTION
AND PAGA SETTLEMENT AND CLASS
NOTICE**

**THIRD STIPULATION RE MODIFICATION OF CLASS ACTION AND PAGA
SETTLEMENT AND CLASS NOTICE**

Pursuant to Section 10.10 of the Class Action and PAGA Settlement and Class Notice (“Settlement Agreement”), Plaintiff Camisha Pascascio (“Plaintiff”), on behalf of herself and the “Settlement Class” defined in the Settlement Agreement, and Defendants MEK Long Beach, LLC and PC Care LLC (collectively “Defendants”), (Plaintiff and Defendants are referred to herein as the “Parties”), by and through their attorneys of record, hereby stipulate to the following modifications of the Settlement Agreement:

RECITALS

1. The Settlement Administrator included a W-9 Form with the Notice mailing for Class Members to return and provide their Social Security Number;
2. After notice by mail and publication, and the conclusion of the response period, only four Class Members provided their Social Security Numbers to the Administrator;
3. Pursuant to the American Rescue Plan Act of 2021, 15 USC 9001 et seq., the Settlement Administrator can only disburse up to \$600 of the non-wage portion of a Class Member’s settlement payment to those Class Members for whom the Administrator does not have a Social Security Number;
4. In a final attempt to secure Social Security Numbers in order to make full payment to the Class Members, the Administrator can send another W-9 Form with the up to \$600 non-wage portion of the settlement payments to those Class Members for whom the Administrator does not have a Social Security Number and instruct the Class Members to return the form and provide their Social Security Numbers in order to receive the remaining balance of their individual settlement payments;
5. The Parties agree that all funds that the Administrator is unable to disburse due to the lack of Social Security Numbers and/or mailing addresses and which remain after the 180-day period for Class Members to cash their settlement checks should be transferred to the cy pres approved by this Court, Bet Tzedek Legal Services for the benefit of the Bet Tzedek Employment Rights Clinic, along with the total amount of the uncashed checks.

THEREFORE, THE PARTIES STIPULATE AND AGREE that:

1. The Settlement Administrator shall send a W-9 Form with the up to \$600 non-wage portion of the settlement payment to any Class Member for whom the Administrator does not have a Social Security Number and include the following instruction: “Enclosed is a check representing a portion of the non-wage allocation of your settlement payment from the settlement approved in *Pascascio v. Epic Contract and Permanent Placement et al.*, Los Angeles County Superior Court Case No. 21STCV26367. In order to receive the remaining portion of your settlement payment, you must complete the enclosed W-9 tax form and provide your tax identification number. If you do not provide your tax identification number by [INSERT DATE FOR 180 DAY DEADLINE], the balance of your settlement payment will be disbursed to the cy pres recipient agreed to by the parties and approved by the Court, Bet Tzedek Legal Services.”;
2. The Parties agree that all funds that are unable to be disbursed by the Administrator due to the lack of a Social Security Number and/or mailing address and which remain after the 180-day period for Class Members to cash their settlement checks should be transferred to the cy pres approved by this Court, Bet Tzedek Legal Services for the benefit of the Bet Tzedek Employment Rights Clinic, along with the total amount of the uncashed checks.

IT IS SO STIPULATED.

1 DATED: February 8, 2024

2 Respectfully submitted,

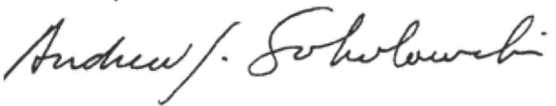
3 O'HAGAN MEYER LLP

4 
5 By: _____
6 Anthony Ocegura
7 Attorneys for Defendant MEK Long Beach
8 LLC

9 DATED: February 8, 2024

10 Respectfully submitted,

11 O'HAGAN MEYER LLP

12 
13 By: _____
14 Melissa t. Daugherty
15 Andrew J. Sokolowski
16 Attorneys for Defendant PC Care, LLC

17 DATED: February 8, 2024

18 Respectfully submitted,

19 MOSS BOLLINGER LLP

20 
21 By: _____
22 Jeremy F. Bollinger
23 Dennis F. Moss
24 Ari E. Moss
25 Attorneys for Plaintiff Camisha Pascascio
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