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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

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

1 **STIPULATION RE MODIFICATION OF CLASS ACTION AND PAGA SETTLEMENT AND**
2 **CLASS NOTICE**

3 Pursuant to the Court’s June 27, 2023, Minute Order and the deficiencies stated on the record by
4 the Court at the June 27, 2023 Hearing on Plaintiff’s Motion for Preliminary Approval of Class
5 Settlement, and Section 10.10 of the Class Action and PAGA Settlement and Class Notice (“Settlement
6 Agreement”), Plaintiff Camisha Pascascio (“Plaintiff”), on behalf of herself and the “Settlement Class”
7 defined in the Settlement Agreement, and Defendants MEK Long Beach, LLC and PC Care LLC
8 (collectively “Defendants”), (Plaintiff and Defendants are referred to herein as the “Parties”), by and
9 through their attorneys of record, hereby stipulate to the following modifications of the Settlement
10 Agreement:

11 WHEREAS, the Court instructed the Parties that (1) class members whose notice packet is
12 returned as undeliverable should have their deadline to opt out of or object to the settlement extended
13 from time of remailing consistent with the Court’s [MODEL] CLASS ACTION SETTLEMENT
14 AGREEMENT AND CLASS NOTICE; and (2) the Class Representative Service Payment to Plaintiff
15 should be reduced to \$5,000.

16 **THEREFORE, THE PARTIES STIPULATE AND AGREE** that:

- 17 1. Consistent with Section 8.4.4 of the Court’s [MODEL] CLASS ACTION SETTLEMENT
18 AGREEMENT AND CLASS NOTICE, Section 7.4 of the Settlement Agreement entitled
19 “Notice to Class Members” shall be modified to include Section 7.4.3.1, which shall state:
20 “The deadlines for Class Members’ written objections, Challenges to Workweeks and/or Pay
21 Periods, and Requests for Exclusion will be extended an additional 14 days beyond the 45
22 days otherwise provided in the Class Notice for all Class Members whose notice is re-mailed.
23 The Administrator will inform the Class Member of the extended deadline with the re-mailed
24 Class Notice.”
- 25 2. Section 3.2.1 of the Settlement Agreement will be modified to reflect that Plaintiff will seek
26 a Class Representative Service Payment of \$5,000 (reduced from \$7,500).

27
28 ///

1 **IT IS SO STIPULATED.**

2 DATED: July 25, 2023

3 Respectfully submitted,

4 DAUGHERTY LORDAN LLP

5
6 By: 

7 Anthony Ocegüera
8 Attorneys for Defendant MEK Long Beach
9 LLC

10 DATED: July 25, 2023

11 Respectfully submitted,

12 DAUGHERTY LORDAN LLP

13
14 By:

15 Melissa t. Daugherty
16 Andrew J. Sokolowski
17 Attorneys for Defendant PC Care, LLC

18 DATED: July 25, 2023

19 Respectfully submitted,

20 MOSS BOLLINGER LLP

21
22 By: 

23 Jeremy F. Bollinger
24 Dennis F. Moss
25 Ari E. Moss
26 Jorge A. Flores
27 Attorneys for Plaintiff Camisha Pascascio
28

1 **IT IS SO STIPULATED.**

2 DATED: July 25, 2023

3 Respectfully submitted,

4 DAUGHERTY LORDAN LLP

5
6 By: _____

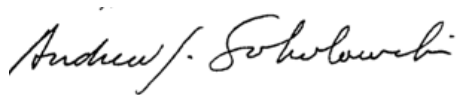
7 Anthony Ocegura
8 Attorneys for Defendant MEK Long Beach
9 LLC

10 DATED: July 25, 2023

11 Respectfully submitted,

12 DAUGHERTY LORDAN LLP

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14 By: _____

15 
16 Melissa t. Daugherty
17 Andrew J. Sokolowski
18 Attorneys for Defendant PC Care, LLC

19 DATED: July 25, 2023

20 Respectfully submitted,

21 MOSS BOLLINGER LLP

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23 By: _____

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28 Jorge A. Flores
Attorneys for Plaintiff Camisha Pascascio