

EXHIBIT C

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Attorneys for Plaintiff Darryl Hadley and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

**IN RE DILIGENT DELIVERY WAGE AND
HOUR CASES**

*Simmons v. California Logistics dba Diligent
Delivery Systems*, Superior Court of California,
County of Alameda, Case No. RG17863988

*Ortega v. Michigan Logistics, Inc., dba Diligent
Delivery Systems, et al.*, Superior Court of
California, County of Los Angeles, Case No.
BC720954

*Hadley v. California Logistics, Inc., dba
Diligent Delivery Systems*, Superior Court of
California, County of Los Angeles, Case No.
18CMCV00022

Case No. RG17863988
Case No. JCCP 4990

The Honorable Evelio Grillo
Department 21

**STIPULATED REQUEST TO LIFT STAY
OF ENFORCEMENT**

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Attorney for Defendants

1 IT IS HEREBY STIPULATED by and between Plaintiffs Aries Simmons, Alden Ortega,
2 Darryl Hadley, and Claudia Farias, on behalf of themselves, Aggrieved Employees, and the State
3 of California, and Defendants California Logistics, Inc. and Western Delivery & Logistics LLC
4 (collectively, "Diligent"), that provided that this Stipulation is accompanied by a declaration
5 attesting to (a) written notice provided to Diligent of their failure to make a payment when due;
6 and (b) the failure of Diligent to cure the defect within 10 business days thereafter, the parties
7 hereto jointly request that this Court lift the stay of enforcement of the Judgment on a date no
8 earlier than five business days following the service and filing of this Stipulation with the Court.
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11 Dated: 11/15/2022

CALIFORNIA LOGISTICS, INC.



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15 Dated: 11/15/2022

WESTERN DELIVERY & LOGISTICS, LLC



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19 Dated: Dec 12, 2022

ARIES SIMMONS



[Aries Simmons \(Dec 12, 2022 13:08 PST\)](#)

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23 Dated: _____

ALDEN ORTEGA

Aries' Simmons

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11/15/2022

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ARIES SIMMONS

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11/28/2022

ALDEN ORTEGA



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Dated: 12 / 12 / 2022

DARRYL HADLEY



Dated: 12 / 13 / 2022

CLAUDIA FARIAS

