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The Original Teddy's Red Tacos Venice LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DULCE ZUAZO, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

TEDDYS INVESTMENTS INC; TEDDYS
ATTITUDE OF GRATITUDE INVESTMENTS;
TEDDYS RED TACOS LAX INC; THE
ORIGINAL TEDDY'S RED TACOS VENICE
LLC; and DOES 1 through 20, inclusive,

Defendants.

Case No. 22STCV00296

Assigned for All Purposes to:
Hon. David S. Cunningham III
Dept. SS11

**JOINT STIPULATION TO AMEND
[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT; AMENDED
[PROPOSED] ORDER**

*[Concurrently filed with Declaration of Julia M.
Toscano, Esq., in Support of Amended
[Proposed] Order]*

1 WHEREAS, on March 24, 2023, Plaintiff Dulce Zuazo (“Plaintiff”) moved the Court for
2 Preliminary Approval of the Class Action Settlement.

3 WHEREAS, attached as Exhibit 2 to the Declaration of Jessica L. Campbell in Support of
4 Plaintiff’s Motion for Preliminary Approval of Class Action Settlement is an executed copy of the
5 Amended Joint Stipulation to Settlement (“Settlement Agreement”). Pursuant to Article 1,
6 Definition (g) of the Settlement Agreement, “Class Period” is defined as “July 10, 2017 through
7 January 11, 2023.”

8 WHEREAS, on February 23, 2024, the Court granted Plaintiff’s Motion for Preliminary
9 Approval, and set the hearing date for the final fairness and approval motion on June 12, 2024.

10 WHEREAS, Defendants Teddys Investments Inc, Teddys Attitude of Gratitude
11 Investments, Teddys Red Tacos LAX Inc, The Original Teddy’s Red Tacos Venice LLC
12 (collectively, “Defendants), in preparing a Class List to provide to the Settlement Administrator,
13 gathered their own records and the records of current and former human resources servicers, and
14 found that the earliest employee records in their possession, custody, and control date back to
15 February 20, 2020.

16 WHEREAS, in the interest of maximizing the monetary award to presently identifiable
17 Class Members without precluding the rights of any presently unidentifiable potential Class
18 Members, Plaintiff and Defendants (collectively, “the Parties”) have agreed to revise the settlement
19 agreement to define “Class Period” (Article 1, Definition (g)) as “February 20, 2020 through
20 January 11, 2023.” The Class Period is also the length of the release period, so the effect of this
21 change is to limit the time period for the release to start in February 20, 2020 as well.

22 WHEREAS, the Parties have executed a revised settlement agreement to reflect the
23 modified definition of “Class Period,” which is attached as Exhibit 1 to the Declaration of Julia M.
24 Toscano.

25 WHEREAS, the parties mutually agree that Paragraph 4 of the Order Granting Plaintiff’s
26 Motion for Preliminary Approval of the Class Action Settlement should be amended to reflect the
27 above-described definition of “Class Period.”

28 WHEREAS, a Final Fairness and Approval Hearing is currently set to be held before this

1 Court on June 12, 2024 at 9:30 a.m. in Department 11 of the Superior Court for the State of
2 California, County of Los Angeles, located at 312 N Spring St, Los Angeles, CA 90012.

3 WHEREAS, considering the Parties' stipulation to amend the Settlement Agreement at this
4 time, the parties further stipulate to continue the Final Fairness and Approval Hearing currently set
5 for June 12, 2024 at 9:30 a.m. to July 31, 2024 at 9:30 a.m., or the soonest date more convenient
6 to the Court thereafter.

7 IT IS THEREFORE STIPULATED AND AGREED, by and between the Parties, through
8 their respective counsel, as follows:

- 9 1. Paragraph 4 of the Order Granting Plaintiff's Motion for Preliminary Approval of the
10 Class Action Settlement, to be reviewed and signed by the Court, should be amended to
11 reflect the following definition of the class period:

12 The Class is defined as all current and former non-exempt employees who
13 are or were employed by Defendants in California at any time from
14 February 20, 2020, through January 11, 2023.

- 15 2. The Final Fairness and Approval Hearing is currently set to be held before this Court
16 on June 12, 2024 at 9:30 a.m. is continued to July 31, 2024 at 9:30 a.m., or the soonest
17 date more convenient to the Court thereafter.

18 Dated: 4/05/2024

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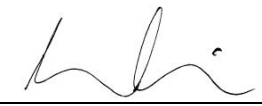
19
20 By: 

Julia Toscano

Attorneys for Plaintiff, Dulce Zuazo

21
22
23 Dated: 4/25/24

WEINBERG GONSER LLP

24
25 By: 

Shahrokh Sheik

Attorneys for Defendant, Teddy's
Investments