

MEDIATOR PROPOSAL

Nicolini v EGL Properties Inc.

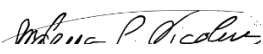
After extensive discussions with counsel over the past several weeks I feel it is appropriate to make a proposal to resolve the matter taking into consideration the issues raised by both sides. I am going to make a mediator's proposal which will remain open until 5pm PDT on Friday March 1, 2024. The parties will be required to sign this proposal with either a signed acceptance or a rejection by the parties.

1. Defendant will pay to plaintiff the gross sum of \$150,000 to plaintiff allocated as follows:
 - a. \$15,000 will be allocated to LWDA for paga penalties to be accepted by court approval;
 - b. \$125,000 will be paid pursuant to a 1099 to the Alfredo Nava Client trust account;
 - c. \$10,000 will be paid to plaintiff pursuant to a payroll check minus all appropriate payroll deductions;
2. Defendant will reimburse the plaintiff \$6,000 for the sanctions ordered paid by the court;
3. Defendant will pay all mediation fees and will reimburse the plaintiff for the fees she paid to Signature Resolution;
4. The parties will sign a mutual general release of all claims either known or unknown other than Paga claims;
5. Plaintiff will provide an appropriate form W-4 and form W-9 within five days of signing of the proposal;
6. Defendant's counsel will provide a long form agreement within 5 days of signing of the proposal to plaintiff's counsel;

7. The settlement agreement will contain a confidentiality agreement as to plaintiff consistent with California law solely as to the settlement terms and amount of payment;
8. Plaintiff counsel will file a motion for approval of the Paga settlement within 14 days of the signature of this proposal;
9. This entire settlement is conditioned upon approval of the Paga penalties by the court;
10. Payment will be made within 30 days of the Court's approval of the PAGA settlement;
11. This signed proposal will be governed by C.C.P. Section 664.6;
12. Each side to bear their own costs and attorneys fees.

1st

Executed at 10:00 a.m. on the _____ day of March, 2024 at
Los Angeles

By: . Accept: x; Reject: _____

Mauna Nicolini

By: _____ Accept: _____; Reject: _____

EGL Properties Inc.

7. The settlement agreement will contain a confidentiality agreement as to plaintiff consistent with California law solely as to the settlement terms and amount of payment;
8. Plaintiff counsel will file a motion for approval of the Paga settlement within 14 days of the signature of this proposal;
9. This entire settlement is conditioned upon approval of the Paga penalties by the court;
10. Payment will be made within 30 days of the Court's approval of the PAGA settlement;
11. This signed proposal will be governed by C.C.P. Section 664.6;
12. Each side to bear their own costs and attorneys fees.

Executed at _____ on the 1st day of March, 2024 at

By: _____. Accept: ____; Reject: _____

Mauna Nicolini

By:  Accept ; Reject: _____

EGL Properties Inc.