

Heather Davis (SBN 239372)
heather@protectionlawgroup.com
Amir Nayebdadash (SBN 232204)
amir@protectionlawgroup.com
PROTECTION LAW GROUP LLP
237 California Street
El Segundo, California, 90245
Telephone: (424) 290-3095
Facsimile: (866) 264-7880

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY SAN DIEGO

IVAN MARQUEZ, individually and on behalf of
others similarly situated and as an aggrieved
employee and Private Attorney General;
FERNANDO SALGUERO, individually and on
behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General,
Plaintiffs,

vs.

COLLABERA, INC. a New Jersey corporation;
and DOES 1 through 50, inclusive,
Defendants.

Case No. 37-2022-00010988-CU-OE-CTL
*Assigned for All Purposes to: Hon. John S.
Meyer, Dept. C-64*

**FIRST AMENDMENT TO JOINT
STIPULATION OF CLASS ACTION
AND PAGA SETTLEMENT**

Complaint Filed: March 22, 2022
Trial Date: None Set

FIRST AMENDMENT TO JOINT STIPULATION OF CLASS ACTION AND PAGA SETTLEMENT

WHEREAS, on or about July 28, 2022, Plaintiffs Ivan Marquez and Fernando Salguero (“Plaintiffs”) and Defendant Collabera, Inc. (“Defendant”)(collectively “the Parties” executed a Joint Stipulation of Class Action and PAGA Settlement.

WHEREAS, within the Agreement there are a number of inadvertent errors that the Parties wish to remedy.

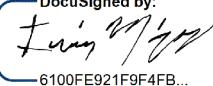
THEREFORE, the Parties hereby stipulate as follows:

1. Paragraph A.26 of the Agreement shall be revised to read as follows: “PAGA Period means from March 22, 2019, through the Workweeks Threshold date or the date of preliminary approval of the proposed settlement, whichever arrives first.”
2. Paragraph C.4 of the Agreement shall be revised to include the Settlement Administrator’s current estimated costs of \$33,770.00
3. Paragraph A.17 shall be revised to indicate that Plaintiff’s Counsel will seek fees in the amount of 35% of the Total Settlement Payment consistent with Paragraph D.2.

Dated: 10/25/2022 _____

PLAINTIFF

By:

DocuSigned by:

6100FE921F9F4FB...
Ivan Marquez

PLAINTIFF

Dated: _____

By:

Fernando Salguero

FIRST AMENDMENT TO JOINT STIPULATION OF CLASS ACTION AND PAGA SETTLEMENT

WHEREAS, on or about July 28, 2022, Plaintiffs Ivan Marquez and Fernando Salguero (“Plaintiffs”) and Defendant Collabera, Inc. (“Defendant”)(collectively “the Parties” executed a Joint Stipulation of Class Action and PAGA Settlement.

WHEREAS, within the Agreement there are a number of inadvertent errors that the Parties wish to remedy.

THEREFORE, the Parties hereby stipulate as follows:

1. Paragraph A.26 of the Agreement shall be revised to read as follows: “PAGA Period means from March 22, 2019, through the Workweeks Threshold date or the date of preliminary approval of the proposed settlement, whichever arrives first.”
2. Paragraph C.4 of the Agreement shall be revised to include the Settlement Administrator’s current estimated costs of \$33,770.00
3. Paragraph A.17 shall be revised to indicate that Plaintiff’s Counsel will seek fees in the amount of 35% of the Total Settlement Payment consistent with Paragraph D.2.

Dated: _____

PLAINTIFF

By:

Ivan Marquez

10/25/2022
Dated: _____

PLAINTIFF

By:

DocuSigned by:
Fernando Salguero
66C0448FF1CC42C...

Fernando Salguero

Dated: October 26, 2022

DEFENDANT COLLABERA, INC.

By: 

Name: Rebecca Aragon

Title: Attorney for Defendant Collabera, Inc.