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Attorneys for Defendants
WEST COAST CHILL, INC., a Nevada
corporation and THE JOSEPH COMPANY
INTERNATIONAL, a California corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, CIVIL COMPLEX CENTER

MICHELLE GARCIA-VIGIL, individually,
and as a representative of other aggrieved
employees,

Plaintiff,

v.

WEST COAST CHILL, INC., a Nevada
corporation; THE JOSEPH COMPANY
INTERNATIONAL, a California
corporation and DOES 1 through 250,
inclusive,

Defendants.

CASE NO. 30-2016-00857926-CU-OE-CJC

Assigned For All Purposes To:

Judge: Hon. William D. Claster

Dept: CX-102

**STIPULATION FOR ENTRY OF
JUDGMENT**

Date of Filing: June 14, 2016

Trial Readiness Conference: June 1, 2018

Trial Date: June 11, 2018

Plaintiff MICHELLE GARCIA-VIGIL and Defendants WEST COAST CHILL, INC.
and THE JOSEPH COMPANY INTERNATIONAL stipulate as follows:

1. That the stipulation is entered into settlement of this litigation and the Court
may enter judgment pursuant to the terms of this stipulation.

2. A copy of the Proposed Judgment in a form approved by the parties is attached
to this stipulation.

3. Defendants WEST COAST CHILL, INC. and THE JOSEPH COMPANY
INTERNATIONAL agrees to pay to Plaintiff the sum of \$50,000.00, to be paid in payments as
follows:

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- \$10,000.00 on June 1, 2018, or within ten (10) days of the Court's approval of the parties' settlement of the PAGA claims; and
- \$8,000.00 per month for five (5) months starting July 1, 2018, through November 1, 2018.

4. Plaintiff shall dismiss this action without prejudice. If Defendants default in any of the payments provided for in paragraph 3 above, which default is not cured within ten (10) calendar days after written notice to Scott Berger, Executive Vice President of Joseph Company International 1711 Langley Ave., Irvine, CA 92614 (949-474-2200); and to Matthew W. Johnson of Murtaugh Treglia Stern & Deily 2603 Main Street Penthouse, Irvine, CA 92614 (949-794-4000), of such default Plaintiff may apply to the court, ex parte, without the necessity of a noticed motion and upon the declaration of Plaintiff's counsel, to vacate the dismissal of the above entitled action and have judgment entered pursuant to *CCP* §664.6 in the amount of \$50,000, less any payments made by Defendant hereunder as provided for in the form of the Judgment attached hereto as Exhibit A. The parties expressly agree that the court shall reserve jurisdiction to enforce this settlement pursuant to *CCP* §664.6.

5. This stipulation shall be held by Plaintiff's counsel and shall not be filed with the court unless and until Defendants fail to make the payments as provided for this stipulation. Upon Defendants' payment of all sums due hereunder, Plaintiff's counsel will deliver the original stipulation to Defendants' counsel and will file a Request for Dismissal of the entire action with prejudice.

Date: May __, 2018

MICHELLE GARCIA-VIGIL

Date: May __, 2018

WEST COAST CHILL, INC.
By:

Date: May __, 2018

THE JOSEPH COMPANY INTERNATIONAL
By: