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Attorneys for Plaintiff

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

CHELSEA OLSON, individually, and on behalf
of all others similarly situated, and on behalf of
the State of California and other aggrieved
persons,

Plaintiff,

v.

NATIONAL AVC, LLC DBA THRIVE PET
HEALTHCARE, a limited liability company;
PATHWAY VET ALLIANCE LLC, a limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 37-2022-00030058-CU-OE-CTL

[Assigned for all purposes to: Hon. Michael
D. Washington, Dept. C-73]

Complaint filed: July 29, 2022
FAC filed: May 15, 2023
SAC filed: May 20, 2026

CLASS & REPRESENTATIVE ACTION

**JOINT STIPULATION TO AMEND
ORDER GRANTING PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

[Filed concurrently with the Declaration of
Giancarlo Recino in Support of Joint
Stipulation to Amend Order Granting
Plaintiffs' Motion for Preliminary Approval
of Class and PAGA Settlement and Amended
Order Granting Plaintiffs' Motion to Approve
Class Action and PAGA Settlement]

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
2 **RECORD**

3 Plaintiffs Chelsea Olson, Anthony Banuelos, and Dylan Lane (“Plaintiffs”) and
4 Defendants National AVC, LLC (“National AVC”) and Pathway Vet Alliance LLC (“Pathway,”
5 together with National AVC, the “Defendants;” Plaintiffs and Defendants collectively, the
6 “Parties”) by and through their respective counsel of record, stipulate and jointly request as
7 follows:

8 **WHEREAS**, on May 20, 2026, the Motion for Preliminary Approval of Class Action and
9 PAGA Settlement (“Motion”) was filed;

10 **WHEREAS**, on June 12, 2026, the Court Granted the Motion and Entered Plaintiff’s
11 [Proposed] Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action and PAGA
12 Settlement;

13 **WHEREAS**, subsequent to the Order being issued on June 12, 2026, it was determined that
14 there was an inadvertent error in the [Proposed] Order Granting Plaintiffs’ Motion for Preliminary
15 Approval of Class Action and PAGA Settlement.

16 **WHEREAS**, the Order incorrectly defines the class, erroneously stating, “The Court
17 provisionally certifies for settlement purposes only the following class (the "Settlement Class"): all
18 non-exempt persons who were employed by National AVC, LLC in the State of California at any
19 time from July 29, 2022 through May 5, 2022 and all non-exempt persons who were employed by
20 Pathway in the State of California at any time between July 21, 2022 and May 23, 2024.”

21 **WHEREAS**, consistent with the terms of the Settlement Agreement, the class should be
22 defined as follows: all non-exempt persons who were employed by National AVC, LLC in the State
23 of California at any time from July 29, 2018 through May 5, 2022 and all non-exempt persons who
24 were employed by Pathway in the State of California at any time between June 29, 2019 and May
25 23, 2024.

26 **WHEREAS**, to rectify this issue, the Parties have since met and conferred and agreed to
27 seek Court approval of an Amended [Proposed] Order Granting Plaintiffs’ Motion for Preliminary
28 Approval of Class Action and PAGA Settlement;

1 **WHEREAS**, a redlined version of the Amended [Proposed] Order Granting Plaintiffs’
2 Motion for Preliminary Approval of Class Action and PAGA Settlement is attached hereto as
3 Exhibit A and a clean version of the Amended [Proposed] Order is attached hereto as Exhibit B.

4 **THEREFORE**, subject to this Court’s approval, **THE PARTIES HEREBY**
5 **STIPULATE** to and respectfully request the following:

- 6 1. The Court approve the Amended [Proposed] Order Granting Plaintiffs’ Motion for
7 Preliminary Approval of Class Action and PAGA Settlement attached as Exhibit B hereto.

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10 Dated: 8/21/2026

WILSHIRE LAW FIRM, PLC

11 By: /s/ Giancarlo Recinos
12 Benjamin H. Haber
13 Arrash T. Fattahi
14 Daniel J. Kramer
Giancarlo Recinos
Arman A. Salehi
Attorneys for Plaintiffs

15 Dated: 8/20/2026

SEYFARTH SHAW LLP

16 By: /s/ Parnian Vafaeenia
17 Kerry M. Friedrichs
18 Justin Curley
19 Parnian Vafaeenia
20 Attorneys for Defendants
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EXHIBIT A

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

CHELSEA OLSON, individually, and on behalf
of all others similarly situated, and on behalf of
the State of California and other aggrieved
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NATIONAL AVC, LLC DBA THRIVE PET
HEALTHCARE, a limited liability company;
PATHWAY VET ALLIANCE LLC, a limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 37-2022-00030058-CU-OE-CTL

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Michael
D. Washington, Dept. C-73]*

AMENDED [PROPOSED] ORDER
GRANTING PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT

PRELIMINARY APPROVAL HEARING:

Date: June 12, 2026

Time: 9:00 a.m.

Dept.: C-73

Complaint filed: July 29, 2022

FAC filed: May 15, 2023

SAC filed: May 20, 2026

1 The Motion for Preliminary Approval of Class Action and PAGA Settlement came
2 before this Court on June 12, 2026, at 9:00 a.m., in Department C-73 of the Superior Court of
3 California, County of San Diego, located 330 West Broadway, San Diego, California 92101.
4 The Court, having considered the proposed Class and Representative Action Settlement
5 Agreement and Class Notice entered into by and between Plaintiffs Chelsea Olson, Anthony
6 Banuelos, and Dylan Lane ("Plaintiffs") and Defendants National AVC, LLC ("National AVC")
7 and Pathway Vet Alliance LLC ("Pathway," together with National AVC, the "Defendants;"
8 Plaintiffs and Defendants collectively, the "Parties"), attached as **Exhibit 3** to the Declaration
9 of Arrash T. Fattahi in Support of Plaintiffs' Motion for Preliminary Approval of Class Action
10 and PAGA Settlement (hereinafter collectively, the "Settlement" or "Settlement Agreement");
11 having considered the Motion for Preliminary Approval of Class Action and PAGA Settlement;
12 having considered the points and authorities and declaration submitted by the Parties in support
13 thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

14 1. The Court finds on a preliminary basis that the Settlement Agreement appears to
15 be fair, adequate, and reasonable and therefore meets the requirements for preliminary approval.
16 The Court grants preliminary approval of the Settlement and the Settlement Class based upon
17 the terms set forth in the Settlement Agreement between the Parties.

18 2. The Settlement falls within the range of reasonableness of a settlement which
19 could ultimately be given final approval by this Court, and appears to be presumptively valid,
20 subject only to any objections that may be raised at the Final Approval Hearing and final
21 approval by this Court. Defendants have agreed to pay \$4,500,000.00 to cover (a) Individual
22 Class Payments to Participating Class Members (class members who do not validly opt out); (b)
23 Individual FLSA Payments; (c) Private Attorneys General Act ("PAGA") Penalties in the
24 amount of \$200,000.00 with 75% (\$150,000.00) allocated to the California Labor & Workforce
25 Development Agency ("LWDA") and 25% (\$50,000.00) allocated to the Individual PAGA
26 Payments to be paid to aggrieved employees; (c) Class Representative Service Payments of up
27 to \$15,000.00 to each named Plaintiff (\$45,000.00 total); (d) Class Counsel Fees Payment of
28 not more than one-third (1/3) of the Gross Settlement Amount (\$1,500,000.00) and Class

1 Counsel Litigation Expenses Payment up to \$45,000.00 for actual litigation expenses incurred
2 by Class Counsel; and (e) Administrator Expenses Payment not to exceed \$23,950.00.

3 3. The Court preliminarily finds that the terms of the Settlement appear to be within
4 the range of possible approval, pursuant to California Code of Civil Procedure § 382 and
5 applicable law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair
6 and reasonable to the class members when balanced against the probable outcome of further
7 litigation relating to class certification, liability and damages issues, and potential appeals; (2)
8 significant informal discovery, investigation, research, and litigation have been conducted such
9 that counsel for the Parties at this time are able to reasonably evaluate their respective positions;
10 (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented
11 by the further prosecution of the litigation; and (4) the proposed Settlement has been reached as
12 the result of intensive, serious, and non-collusive negotiations between the Parties with the
13 assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds
14 that the Settlement Agreement was entered into in good faith.

15 4. A final approval hearing on the question of whether the proposed Settlement,
16 attorneys' fees and costs to Class Counsel, payment to the LWDA and aggrieved employees for
17 their share of the settlement of claims for penalties under the PAGA, and the Class
18 Representative Service Payments should be finally approved as fair, reasonable and adequate
19 as to the members of the Class is hereby set in accordance with the Implementation Schedule
20 set forth below.

21 5. The Court provisionally certifies for settlement purposes only the following class
22 (the "~~Settlement~~-Class Members"): all non-exempt persons who were employed by National
23 AVC, LLC in the State of California at any time from July 29, ~~2021~~2018 through May 5, 2022
24 and all non-exempt persons who were employed by Pathway in the State of California at any
25 time between ~~July 21, 2022~~June 29, 2019 and May 23, 2024.

26 6. The Court provisionally certifies for settlement purposes only the FLSA Subclass:
27 all non-exempt persons who were employed by National AVC in the State of California at any
28 time between July 29, 2019 and May 5, 2022 and all non-exempt persons who were employed

Commented [1]: Rejected the deletion of this word

1 by Pathway in the State of California at any time between June 29, 2020 and May 23, 2024.

2 7. The Court finds, for settlement purposes only, that the Settlement Class meets the
3 requirements for certification under California Code of Civil Procedure § 382 in that: (1) the
4 Settlement Class Members are so numerous that joinder is impractical; (2) there are questions
5 of law and fact that are common, or of general interest, to all Settlement Class Members, which
6 predominate over individual issues; (3) Plaintiffs' claims are typical of the claims of the
7 Settlement Class Members; (4) Plaintiffs and Class Counsel will fairly and adequately protect
8 the interests of the Settlement Class Members; and (5) a class action is superior to other
9 available methods for the fair and efficient adjudication of the controversy.

10 8. The Court appoints as Class Representatives, for settlement purposes only,
11 Plaintiffs Chelsea Olson, Anthony Banuelos, and Dylan Lane. The Court further preliminarily
12 approves Plaintiffs' ability to request Class Representative Service Payments of up to
13 \$15,000.00 per named plaintiff (\$45,000.00 total).

14 9. The Court appoints, for settlement purposes only, Benjamin H. Haber, Arrash T.
15 Fattahi, Daniel J. Kramer, Emily Borman, and Arman A. Salehi of Wilshire Law Firm, PLC as
16 Class Counsel. The Court further preliminarily approves Class Counsel's ability to request
17 attorneys' fees of not more than one-third (1/3) of the Gross Settlement Amount
18 (\$1,500,000.00), and costs not to exceed \$45,000.00.

19 10. The Court appoints ILYM Group, Inc. as the Settlement Administrator with
20 reasonable administration costs estimated not to exceed \$23,950.00.

21 11. The Court approves, as to form and content the Class Notice, attached to the
22 Settlement Agreement as Exhibit A. The Court finds on a preliminary basis that the plan for
23 distribution of the Class Notice to Settlement Class Members satisfies due process, provides the
24 best notice practicable under the circumstances, and shall constitute due and sufficient notice to
25 all persons entitled thereto.

26 12. The Parties are ordered to carry out the Settlement according to the terms of the
27 Settlement Agreement.

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1 13. Any class member who does not timely and validly request exclusion from the
2 Settlement may object to the Settlement Agreement.

3 14. The Court orders the following Implementation Schedule:

Event	Timing
Class Data: Last day for Defendants to provide Class Data to the Administrator	15 business days after the Court grants <u>initially granted</u> Preliminary Approval of the Settlement
Class Notice: Last day for Administrator to mail the Class Notice to Class Members	25 business days after the Court grants <u>initially granted</u> Preliminary Approval of the Settlement
Response Deadline: Last day for Class Members to submit written objections, challenges to workweeks and/or pay periods, and requests for exclusion	45 days after Class Notice is was mailed out by the Administrator
Filing Deadline: Last day to file Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payments to Plaintiffs	16 court days before the Final Approval Hearing
Final Approval Hearing	<u> </u> , November 14 <u>20</u> , 2026, at <u> </u> 9:00 a.m. in Dept. C-73 of the above-referenced Court.

Commented [2]: You had the wrong date

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4 15. The Court further ORDERS that, pending further order of this Court, all proceedings
5 in this lawsuit, except those contemplated herein and in the settlement, are stayed.

6 **IT IS SO ORDERED.**

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8 DATE: _____

HON. MICHAEL D. WASHINGTON
JUDGE OF THE SUPERIOR COURT

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EXHIBIT B

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CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Michael
D. Washington, Dept. C-73]*

**AMENDED [PROPOSED] ORDER
GRANTING PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

PRELIMINARY APPROVAL HEARING:

Date: June 12, 2026

Time: 9:00 a.m.

Dept.: C-73

Complaint filed: July 29, 2022

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1 The Motion for Preliminary Approval of Class Action and PAGA Settlement came
2 before this Court on June 12, 2026, at 9:00 a.m., in Department C-73 of the Superior Court of
3 California, County of San Diego, located 330 West Broadway, San Diego, California 92101.
4 The Court, having considered the proposed Class and Representative Action Settlement
5 Agreement and Class Notice entered into by and between Plaintiffs Chelsea Olson, Anthony
6 Banuelos, and Dylan Lane (“Plaintiffs”) and Defendants National AVC, LLC (“National AVC”) and
7 Pathway Vet Alliance LLC (“Pathway,” together with National AVC, the “Defendants;”
8 Plaintiffs and Defendants collectively, the “Parties”), attached as **Exhibit 3** to the Declaration
9 of Arrash T. Fattahi in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action
10 and PAGA Settlement (hereinafter collectively, the “Settlement” or “Settlement Agreement”);
11 having considered the Motion for Preliminary Approval of Class Action and PAGA Settlement;
12 having considered the points and authorities and declaration submitted by the Parties in support
13 thereof; and good cause appearing, HEREBY ORDERS THE FOLLOWING:

14 1. The Court finds on a preliminary basis that the Settlement Agreement appears to
15 be fair, adequate, and reasonable and therefore meets the requirements for preliminary approval.
16 The Court grants preliminary approval of the Settlement and the Settlement Class based upon
17 the terms set forth in the Settlement Agreement between the Parties.

18 2. The Settlement falls within the range of reasonableness of a settlement which
19 could ultimately be given final approval by this Court, and appears to be presumptively valid,
20 subject only to any objections that may be raised at the Final Approval Hearing and final
21 approval by this Court. Defendants have agreed to pay \$4,500,000.00 to cover (a) Individual
22 Class Payments to Participating Class Members (class members who do not validly opt out); (b)
23 Individual FLSA Payments; (c) Private Attorneys General Act (“PAGA”) Penalties in the
24 amount of \$200,000.00 with 75% (\$150,000.00) allocated to the California Labor & Workforce
25 Development Agency (“LWDA”) and 25% (\$50,000.00) allocated to the Individual PAGA
26 Payments to be paid to aggrieved employees; (c) Class Representative Service Payments of up
27 to \$15,000.00 to each named Plaintiff (\$45,000.00 total); (d) Class Counsel Fees Payment of
28 not more than one-third (1/3) of the Gross Settlement Amount (\$1,500,000.00) and Class

Counsel Litigation Expenses Payment up to \$45,000.00 for actual litigation expenses incurred by Class Counsel; and (e) Administrator Expenses Payment not to exceed \$23,950.00.

3. The Court preliminarily finds that the terms of the Settlement appear to be within the range of possible approval, pursuant to California Code of Civil Procedure § 382 and applicable law. The Court finds on a preliminary basis that: (1) the Settlement amount is fair and reasonable to the class members when balanced against the probable outcome of further litigation relating to class certification, liability and damages issues, and potential appeals; (2) significant informal discovery, investigation, research, and litigation have been conducted such that counsel for the Parties at this time are able to reasonably evaluate their respective positions; (3) settlement at this time will avoid substantial costs, delay, and risks that would be presented by the further prosecution of the litigation; and (4) the proposed Settlement has been reached as the result of intensive, serious, and non-collusive negotiations between the Parties with the assistance of a well-respected class action mediator. Accordingly, the Court preliminarily finds that the Settlement Agreement was entered into in good faith.

4. A final approval hearing on the question of whether the proposed Settlement, attorneys' fees and costs to Class Counsel, payment to the LWDA and aggrieved employees for their share of the settlement of claims for penalties under the PAGA, and the Class Representative Service Payments should be finally approved as fair, reasonable and adequate as to the members of the Class is hereby set in accordance with the Implementation Schedule set forth below.

5. The Court provisionally certifies for settlement purposes only the following class (the "Class Members"): all non-exempt persons who were employed by National AVC, LLC in the State of California at any time from July 29, 2018 through May 5, 2022 and all non-exempt persons who were employed by Pathway in the State of California at any time between June 29, 2019 and May 23, 2024.

6. The Court provisionally certifies for settlement purposes only the FLSA Subclass: all non-exempt persons who were employed by National AVC in the State of California at any time between July 29, 2019 and May 5, 2022 and all non-exempt persons who were employed

1 by Pathway in the State of California at any time between June 29, 2020 and May 23, 2024.

2 7. The Court finds, for settlement purposes only, that the Settlement Class meets the
3 requirements for certification under California Code of Civil Procedure § 382 in that: (1) the
4 Settlement Class Members are so numerous that joinder is impractical; (2) there are questions
5 of law and fact that are common, or of general interest, to all Settlement Class Members, which
6 predominate over individual issues; (3) Plaintiffs' claims are typical of the claims of the
7 Settlement Class Members; (4) Plaintiffs and Class Counsel will fairly and adequately protect
8 the interests of the Settlement Class Members; and (5) a class action is superior to other
9 available methods for the fair and efficient adjudication of the controversy.

10 8. The Court appoints as Class Representatives, for settlement purposes only,
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20 reasonable administration costs estimated not to exceed \$23,950.00.

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22 Settlement Agreement as Exhibit A. The Court finds on a preliminary basis that the plan for
23 distribution of the Class Notice to Settlement Class Members satisfies due process, provides the
24 best notice practicable under the circumstances, and shall constitute due and sufficient notice to
25 all persons entitled thereto.

26 12. The Parties are ordered to carry out the Settlement according to the terms of the
27 Settlement Agreement.

28 ///

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2 Settlement may object to the Settlement Agreement.

3 14. The Court orders the following Implementation Schedule:

4

Event	Timing
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Filing Deadline: Last day to file Motion for Final Approval, Request for Attorneys' Fees and Costs, and Class Representative Service Payments to Plaintiffs	16 court days before the Final Approval Hearing
Final Approval Hearing	November 20, 2026, at 9:00 a.m. in Dept. C-73 of the above-referenced Court.

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1 15. The Court further ORDERS that, pending further order of this Court, all proceedings
2 in this lawsuit, except those contemplated herein and in the settlement, are stayed.

3 **IT IS SO ORDERED.**

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5 DATE: _____

6 HON. MICHAEL D. WASHINGTON
7 JUDGE OF THE SUPERIOR COURT
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