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Attorneys for Plaintiff Nelida Vazquez,
 on behalf of herself and all “aggrieved employees”
 pursuant to Labor Code § 2698 *et seq.*

FILED
 Superior Court of California
 County of Los Angeles
06/01/2026

David W. Slayton, Executive Officer / Clerk of Court
 By: C. Gyimesi Deputy

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

NELIDA VAZQUEZ, on behalf of herself and
 all “aggrieved employees” pursuant to Labor
 Code § 2698 *et seq.*,

Plaintiff,

v.

CV RESOURCES, INC., a California
 corporation, REHRIG PACIFIC COMPANY,
 a Delaware corporation, and DOES 1 through
 10, inclusive,

Defendants.

Case No.: 25NNCV03947

Assigned for all purposes to the
 Hon. Ralph C. Hofer, Dept. D

**STIPULATION AND ~~PROPOSED~~
 ORDER DISMISSING
 REPRESENTATIVE PRIVATE
 ATTORNEYS GENERAL ACT ACTION**

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Declaration of Evan
 S. Gaines]

Complaint Filed: June 10, 2025

STIPULATION

WHEREAS, on June 10, 2025, Plaintiff on behalf of herself and on behalf of all aggrieved employees filed a representative complaint against Defendants CV RESOURCES, INC., a California corporation, REHRIG PACIFIC COMPANY, a Delaware corporation (collectively, “Defendants”), pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”), Labor Code § 2698 et seq., seeking civil penalties for violations of the California Labor Code (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, after a review of the claims and defenses to the Action, and considering Defendants’ contentions that Plaintiff has been paid all wages due and owing and maintains claims that are individual to the other Aggrieved Employees, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only (Gaines Decl., ¶ 3);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and the representative PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 4);

WHEREAS, the Settlement between Plaintiff and Defendants does not contemplate the waiver of any claims by anyone other than Plaintiff and does not provide for the waiver of representative PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. (Gaines Decl. ¶ 5);

WHEREAS, concurrent to the filing of this Stipulation, the Parties have submitted the Settlement Agreement to the Labor and Workforce Development Agency in compliance with Labor Code section 2699(l)(2) (Gaines Decl. ¶ 6); and

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto
2 and through their respective attorneys of record that Plaintiff's individual claims shall be dismissed
3 with prejudice, the claims of all allegedly aggrieved employees shall be dismissed without
4 prejudice, and the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6
5 with respect to all matters related to the consummation of the settlement, including to enforce the
6 Settlement.

7 **IT IS SO STIPULATED.**

8 Dated: May 29, 2026

9 For Plaintiff NELIDA VAZQUEZ

10 GAINES LAW CORPORATION

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12 By: /s/ Evan S. Gaines
Evan S. Gaines, Esq.

For Defendant CV RESOURCES, INC.

STRADLING YOCCA CARLSON &
RAUTH LLP

13 By: /s/ Jared W. Speier*
Jared W. Speier, Esq.
Micole Small, Esq.

14 *As authorized by e-mail on May 27, 2026

15 For Defendant REHRIG PACIFIC
16 COMPANY

17 AKERMAN LLP

18
19 By: /s/ Marissa Alguire*
Marissa Alguire, Esq.
Mojan Anari, Esq.

20 *As authorized by e-mail on May 29, 2026
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ORDER

The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby ORDERS that:

1. The action is hereby DISMISSED WITH PREJUDICE as to Nelida Vazquez' individual claims, and DISMISSED WITHOUT PREJUDICE as to the representative claims under PAGA asserted on behalf of all allegedly aggrieved employees; and

2. The Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6 with respect to all matters related to the consummation of the settlement, including to enforce the Settlement.

IT IS SO ORDERED.

Dated: 06/01/2026



JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

Jared W. Speier, Esq.
Micole Small, Esq.
STRADLING YOCCA CARLSON & RAUTH LLP
jspeier@stradlinglaw.com / msmall@stradlinglaw.com
Attorneys for Defendant CV Resources, Inc.

On the above date:

____X____ (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission via email on the counsel of record listed above.

I certify that the above document was printed on recycled paper.

Executed on May 29, 2026, at Westlake Village, California.

-3-

STIPULATION AND ORDER DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION