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

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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES**

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

18 Plaintiff,

19 v.

20 CV RESOURCES, INC., a California
21 corporation, REHRIG PACIFIC COMPANY,
22 a Delaware corporation, and DOES 1 through
23 10, inclusive,

24 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(1)(2) (Gaines Decl. ¶ 6); and

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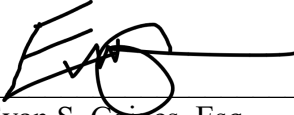
1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto
2 and through their respective attorneys of record that Plaintiff's individual claims shall be dismissed
3 with prejudice, the claims of all allegedly aggrieved employees shall be dismissed without
4 prejudice, and the Court 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

11 By: 
12 Evan S. Gaines, Esq.

For Defendant CV RESOURCES, INC.

STRADLING YOCCA CARLSON &
RAUTH LLP

By: /s/ Jared W. Speier*

Jared W. Speier, Esq.

Micole Small, Esq.

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

For Defendant REHRIG PACIFIC
COMPANY

AKERMAN LLP

By: /s/ Marissa Alguire*

Marissa Alguire, Esq.

Mojan Anari, Esq.

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

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: _____

JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 action. My business address is 4550 E. Thousand Oaks Blvd., Suite 100 Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On May 29, 2026, I served the foregoing document described as **STIPULATION AND [PROPOSED]**
6 **ORDER DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION** the interested
7 parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

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

13 **Marissa Alguire, Esq.**
14 **Mojan Anari, Esq.**
15 **AKERMAN LLP**
16 **marissa.alguire@akerman.com / mojan.anari@akerman.com**
17 **Attorneys for Defendant Rehrig Pacific Company**

18 On the above date:

19 _____ (BY ☒ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
20 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing
21 correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of
22 business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage
23 meter date is more than one day after date of deposit for mailing in affidavit.

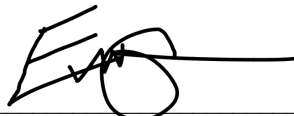
24 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic
25 transmission via email on the counsel of record listed above.

26 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the
27 Labor & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
28 in accordance with the procedure imposed by the LWDA.

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

I declare under penalty of perjury that the foregoing is true and correct.

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

23 
24 _____
25 EVAN S. GAINES, ESQ.