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Attorneys for Intervenors COREY J. DEVINE,
and JERMAINE WILLIS, individually, and on
behalf of all others similarly situated

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF TUOLUMNE**

ANDREA OTANEZ VERDUGO individually
and on behalf of all others
similarly situated,

Plaintiff,

v.

CAPSTONE LOGISTICS, LLC, a Delaware
limited liability company with its principal place
of business in Georgia, and DOES 1 to 100,
inclusive,

Defendants.

) Case No: CV66120

)

) **JOINT STIPULATION TO FILE**

) **CONSOLIDATED AMENDED COMPLAINT**

)

) Date: November 12, 2025

) Time: 8:30 a.m.

) Dept: 5

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) Action Filed: April 22, 2024

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1 **JOINT STIPULATION**

2 Plaintiffs Andrea Otanez Verdugo, Corey J. Devine, Jermaine Willis, and Ivan Escobar
3 (collectively, “Plaintiffs”), and Capstone Logistics, LLC (“Defendant” or “Capstone,” and with
4 Plaintiffs, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

5 WHEREAS, on October 13, 2025, the Parties executed the Class Action and PAGA Settlement
6 Agreement (the “Settlement Agreement”) in which they agreed to settle all pending litigation and
7 arbitration proceedings among and between them;

8 WHEREAS pursuant to the Settlement Agreement, the Parties agreed to stipulate to the filing of
9 a consolidated complaint in these proceedings;

10 WHEREAS the Parties further agreed that the consolidated complaint will include all Plaintiffs,
11 claims, and allegations raised in the Actions (defined in the Settlement Agreement) and in any PAGA
12 letters or notices submitted by Plaintiffs to the California Labor and Workforce Development Agency
13 (“LWDA”);

14 WHEREAS Plaintiffs presented the consolidated complaint to Defendant which has reviewed,
15 commented on, and approved of the filing;

16 NOW, THEREFORE, IT IS HEREBY STIPULATED by and among the Parties, that the
17 Consolidated Amended Complaint is submitted to the Court for filing as the operative complaint in
18 the instant action.

19
20 Dated: October 31, 2025

THE KICK LAW FIRM, APC

21 By: /s/ Taras Kick

22 Taras Kick

23 Tyler Dosaj

24 Attorneys for Intervenors COREY J. DEVINE and
25 JERMAINE WILLIS
26
27
28

1 Dated: October 31, 2025

THE DIVERSITY LAW GROUP

2 By: /s/ Larry Lee

3 Larry Lee

4 Kristen Agnew

Attorneys for Intervenor SHERI KING and IVAN
ESCOBAR

5
6 Dated: October 31, 2025

POTTER HANDY, LLP

7 By: /s/ James Treglio

8 James Treglio

Attorneys for Plaintiff ANDREA VERDUGO-OTANEZ

9
10 Dated: October 31, 2025

DUANE MORRIS LLP

11 By: /s/ Jennifer A. Riley

12 Gerald L. Maatman, Jr. (*pro hac vice*)

13 Jennifer A. Riley

14 James S. Brown

Attorneys for Defendant

CAPSTONE LOGISTICS, LLC