

1 Edwin Aiwarzian (SBN 232943)
edwin@calljustice.com
2 Arby Aiwarzian (SBN 269827)
arby@calljustice.com
3 Joanna Ghosh (SBN 272479)
joanna@calljustice.com
4 Elizabeth Parker-Fawley (SBN 301592)
elizabeth@calljustice.com
5 **LAWYERS for JUSTICE, PC**
6 410 West Arden Avenue, Suite 203
7 Glendale, California 91203
Telephone: (818) 265-1020 / Fax: (818) 265-1021

8 S. Emi Minne (SBN 253179)
emi@parkeminne.com
9 Jill J. Parker (SBN 274230)
jill@parkeminne.com
10 **PARKER & MINNE, LLP**
11 700 South Flower Street, Suite 1000
12 Los Angeles, California 90017
13 Telephone: (310) 882-6833 / Fax: (310) 889-0822

14 Attorneys for Plaintiff
ARTURO GONZALEZ

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF LOS ANGELES**

17
18 ARTURO GONZALEZ, individually, and on
behalf of other members of the general public
19 similarly situated,

20 Plaintiff,

21 vs.

22 HUNT ENTERPRISES, INC., a California
corporation; and DOES 1 through 100, inclusive,

23 Defendants.
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Case No.: 22STCV15057

*Assigned for all purposes to the Honorable
Lawrence P. Riff, Dept. 7*

**JOINT STIPULATION TO AMEND CLASS
ACTION AND PAGA SETTLEMENT
AGREEMENT**

Complaint Filed: May 5, 2022
Trial Date: Not set

1 **JOINT STIPULATION TO AMEND CLASS ACTION AND PAGA SETTLEMENT**
2 **AGREEMENT**

3 Plaintiff Arturo Gonzalez (“Plaintiff”) and Defendant Hunt Enterprises, Inc. (“Defendant”)
4 (collectively, “Parties”), by and through their respective counsel of record, HEREBY STIPULATE
5 AND AGREE to amend the Class Action and PAGA Settlement Agreement previously executed by
6 the Parties on or about May 2, 2023 (“Agreement”) as follows:

7 1. Page 7, paragraph 3.2.4.1 of the Agreement shall be replaced by the following
8 language:

9 Tax Allocation of Individual Class Payments. 15% of each Participating Class
10 Member’s Individual Class Payment will be allocated to settlement of wage claims (the
11 “Wage Portion”). The Wage Portions are subject to tax withholding and will be reported
12 on an IRS W-2 Form. The remaining 85% of each Participating Class Member’s
13 Individual Class Payment will be allocated to settlement of claims for interest and
14 penalties (the “Non-Wage Portion”). The Non-Wage Portions are not subject to wage
15 withholdings and will be reported on IRS 1099 Forms. Participating Class Members
16 assume full responsibility and liability for any employee taxes owed on their Individual
17 Class Payment.

18 **IT IS SO STIPULATED.**

19 Dated: May 9, 2023

20 **PARKER & MINNE, LLP**

21 By: _____

22 S. Emi Minne
23 Attorneys for Plaintiff Arturo Gonzalez

24 Dated: 5/9/2023

25 **SCOTT & WHITEHEAD**

26 By: _____

27 Nancy Rader Whitehead
28 Attorneys for Defendant Hunt Enterprises, Inc.