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Attorneys for Plaintiff Tanya Young,
on behalf of herself and all "aggrieved employees"
pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

TANYA YOUNG, on behalf of herself and all "aggrieved employees" pursuant to Labor Code § 2698 *et seq.*,

Plaintiff,

v.

LODI ADVANCED MEDICAL CENTER, PC, a California corporation, KEVIN STEWART, an individual, and DOES 1 through 10, inclusive,

Defendants.

Case No: STK-CV-UOE-2024-4519
Related Case No.: STK-CV-UOE-2026-0001436

Assigned for all purposes to the Honorable Robert T. Waters, Dept. 11B

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: April 12, 2024
Trial Date: July 27, 2026

STIPULATION

WHEREAS, on April 12, 2024, Plaintiff Tanya Young, on behalf of herself and on behalf of all aggrieved employees filed a representative complaint against Defendants LODI ADVANCED MEDICAL CENTER, PC, a California corporation, and KEVIN STEWART, an individual (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, on February 26, 2026, Plaintiff filed a separate individual action against Defendant Lodi Advanced Medical Center, PC (San Joaquin County Superior Court Case No. STK-CV-UOE-2026-0001436) (the "Related Action"), which seeks damages for the same labor code violations alleged in the instant Action. On March 26, 2026, this Court ordered the cases related and assigned the Related Action to this Department (Gaines Decl., ¶ 3);

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., ¶ 4);

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"). In connection with the Parties' Settlement, Plaintiff will separately seek dismissal of the Related Action with prejudice. (Gaines Decl., ¶ 5);

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. ¶ 6);

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. ¶ 7); and

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

Dated: September 21, 2026

For Plaintiff TANYA YOUNG:

GAINES LAW CORPORATION

By:_____
Evan S. Gaines, Esq.

For Defendants LODI ADVANCED MEDICAL CENTER, PC, and KEVIN STEWART

LAW OFFICES OF W. RUSSELL FIELDS

By:_____
A. Edward Fields, Esq.

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 Tanya Young's 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

PROOF OF SERVICE AND CERTIFICATION

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

_____ (For messenger) my business address is:

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

A. Edward Fields, Esq.
W. Russell Fields, Esq.
LAW OFFICES OF W. RUSSELL FIELDS
2630 J Street
Sacramento, CA 95816
ed@russfieldslaw.com
russ@russfieldslaw.com

On the above date:

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

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

__X__ (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov) 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 October 7, 2026, at Westlake Village, California.

/s/ Evan S. Gaines
EVAN S. GAINES, ESQ.