

Benjamin H. Haber (SBN 315664)
benjamin.haber@wilshirelawfirm.com
Daniel J. Kramer (SBN 314625)
daniel.kramer@wilshirelawfirm.com
Chase M. Stern (SBN 290540)
chase.stern@wilshirelawfirm.com
Alan Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
WILSHIRE LAW FIRM
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

Vanessa F. Chavez, Esq.
vchavez@kleinlaw.com
Anna Burnbaum, Esq.
aburnbaum@kleinlaw.com
**KLEIN, DENATALE, GOLDNER,
COOPER, ROSENLIB & KIMBALL, LLP**
10000 Stockdale Highway, Suite 200
Bakersfield, CA 93311
Telephone: (661) 395-1000
Facsimile: (661) 326-0418

Attorneys for Defendants

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN**

GERMAN ATONDO, individually, on behalf of
all others similarly situated, the State of
California, and other aggrieved persons,

Plaintiff,

v.

LAUREL AG & WATER, LLC, a California
limited liability company; LODI PUMP &
IRRIGATION, LLC, a California limited
liability company; LODI PUMP AND
IRRIGATION, LLC, a California limited
liability company; U.S. PIPE AND
IRRIGATION, LLC, a California limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: BCV-24-102996
Assigned to Honorable T. Mark Smith, Dept.
T2

Complaint Filed: August 30, 2024
Trial date: Not set

PAGA REPRESENTATIVE ACTION

**JOINT STIPULATION TO AMEND
JUDGMENT AND ORDER GRANTING
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

[Filed concurrently with the Declaration of
Daniel J. Kramer in Support of Joint
Stipulation to Amend Judgement and Order
Granting Plaintiff's Motion to Approve
PAGA Settlement]

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff German Atondo (“Plaintiff”) and Defendants Laurel AG & Water, LLC, Lodi Pump
3 & Irrigation, LLC, Lodi Pump and Irrigation, LLC, and U.S. Pipe and Irrigation, LLC (collectively,
4 “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective counsel of
5 record, stipulate and jointly request as follows:

6 **WHEREAS**, on April 21, 2026, Plaintiff’s Motion to Approve PAGA Settlement
7 (“Motion”) was filed;

8 **WHEREAS**, on May 28, 2026, Plaintiff’s Judgment and Order Granting Plaintiff’s Motion
9 to Approve PAGA Settlement was granted;

10 **WHEREAS**, in support of the Motion, Plaintiff’s counsel included the costs incurred as of
11 the date of the filing of the Motion.

12 **WHEREAS**, Plaintiff’s counsel attached a list of costs and the categories of costs incurred
13 in the case to date by Wilshire Law Firm, PLC as Exhibit 6 to the Declaration of Alan Wilcox in
14 Support of Plaintiff’s Motion to Approve PAGA Settlement which indicated that PAGA Counsel
15 had incurred costs of \$12,648.50 at that time;

16 **WHEREAS**, in support of the Motion, Plaintiff’s counsel included costs totaling \$12,648.50
17 in the proposed Judgment and Order Granting Plaintiff’s Motion to Approve PAGA Settlement;

18 **WHEREAS**, subsequent to the Judgment and Order being issued on May 28, 2026, it was
19 determined that there was an inadvertent error in Plaintiff’s Counsel’s costs provided in support of
20 the Motion, specifically a charge of \$7,500 for the mediation with “Howard Broadman Law
21 Corporation” which ultimately led to the resolution of this matter and research fees totaling \$805.41,
22 but had inadvertently failed to be processed, as a result, was not included in the costs breakdown
23 attached as Exhibit 6 to the Declaration of Alan Wilcox in Support of Plaintiff’s Motion to Approve
24 PAGA Settlement;

25 **WHEREAS**, Plaintiff’s counsel disbursed payment to “Howard Broadman Law
26 Corporation” and Westlaw, and as a result, Plaintiff’s costs incurred increased to \$20,933.65;

27 **WHEREAS**, as of this date, PAGA Counsel has incurred at least \$20,933.65 in costs. A
28 true and correct copy of the updated costs and the categories of costs for the costs incurred in this

case by Wilshire Law Firm, PLC is attached to the Declaration of Daniel J. Kramer in Support of Parties' Stipulation to Amend Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement as Exhibit A;

WHEREAS, the Parties have since met and conferred and agreed to seek Court approval of an amended Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement.

WHEREAS, a redlined version of the amended Order Granting Plaintiff's Motion to Approve PAGA Settlement is attached as Exhibit B to the Kramer Declaration and a clean version of the amended Order is attached thereto as Exhibit C.

THEREFORE, subject to this Court's approval, **THE PARTIES HEREBY STIPULATE** to and respectfully request the following:

1. The Court approve the Amended [Proposed] Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement attached as Exhibit C to the Kramer Declaration.

Respectfully submitted,

Dated: July 16, 2026

WILSHIRE LAW FIRM

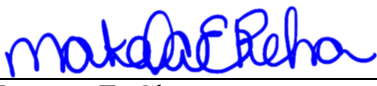
By: 

Benjamin H. Haber
Daniel J. Kramer
Chase Stern
Alan Wilcox

Attorneys for Plaintiff

Dated: July 16, 2026

**KLEIN, DENATALE, GOLDNER,
COOPER, ROSENLIEB & KIMBALL, LLP**

By: 

Vanessa F. Chavez
Anna Burnbaum
Makala E. Reha

Attorneys for Defendants

GERMAN ATONDO v. LAUREL AG & WATER, LLC, et al.

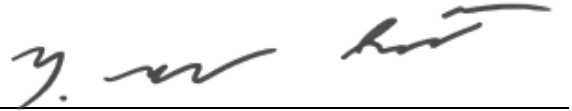
Kern County Superior Court Case No. BCV-24-102996

~~PROPOSED~~ ORDER

The Court, having reviewed the Parties' Joint Stipulation to Approve Amended Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement, and good cause appearing, hereby approves the amended Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement attached as Exhibit C to the Declaration of Daniel J. Kramer in Support of Parties' Joint Stipulation to Approve Amended Judgment and Order Granting Plaintiff's Motion to Approve PAGA Settlement.

IT IS SO ORDERED.

DATE: **August 4, 2026**



Hon. T. Mark Smith
Kern County Superior Court

WILSHIRE LAW FIRM, PLC
660 S. Figueroa St., Sky Lobby
Los Angeles, CA 90017

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Rebecca Padilla