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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

MIREYA MARTINEZ, individually and on
behalf of others similarly situated, and as an
aggrieved employee and Private Attorney
General,

Plaintiff,

vs.

CENCORA, INC., a Delaware corporation;
AMERISOURCEBERGEN DRUG
CORPORATION, a Delaware corporation;
AMERISOURCEBERGEN SERVICES
CORPORATION, a Delaware corporation;
AMERISOURCEBERGEN SPECIALTY
GROUP, LLC, a Delaware limited liability
company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CIVRS2401305

*Assigned for All Purposes to: Hon. Gilbert
Ochoa, Dept. R17*

**FIRST AMENDMENT TO JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT**

Complaint Filed: October 7, 2024
FAC Filed: November 22, 2024
Trial Date: None Set

1 **FIRST AMENDMENT TO SETTLEMENT AGREEMENT**

2 Plaintiff Mireya Martinez individually and on behalf of the Class, and Defendant
3 AmerisourceBergen Drug Corporation (collectively the Parties) hereby agree to Amend the
4 provisions of the Parties' Joint Stipulation of Class Action and PAGA Settlement Agreement as
5 follows:

6 **WHEREAS**, on or about April 13, 2026, the Parties executed a Joint Stipulation of Private
7 Attorneys General Act Settlement (hereinafter "Agreement" or "Settlement Agreement") to
8 resolve the claims alleged by Plaintiffs under the Private Attorneys General Act.

9 **WHEREAS**, as part of this Agreement the Parties agreed to allocate \$11,880.00 to the
10 costs of administration of the proposed Settlement after receiving a quote from the settlement
11 administrator for this amount.

12 **WHEREAS**, at the time the quote was obtained, the Parties had not yet finalized where to
13 send unclaimed funds from the settlement.

14 **WHEREAS**, in order to distribute the Unclaimed Funds to the State Controller's Office as
15 contemplated in the Agreement, the Settlement Administrator has advised that the costs of
16 Settlement Administration will increase approximately \$500.00.

17 **WHEREAS**, these costs are reasonable and necessary to the resolution of this matter.

18 **THEREFORE**, the Parties by and through their counsel of record pursuant to paragraph
19 84 of the Settlement Agreement hereby stipulate to increase the costs of settlement administration
20 in the Agreement from \$11,880.00 to \$12,380.00. All references to the Settlement Administration
21 Costs in the Settlement and Proposed Class Notice shall be updated to reflect the revised
22 Settlement Administration Costs.

23
24 **[SIGNATURES ON FOLLOWING PAGE]**

1 Dated: 6/17/2026

PROTECTION LAW GROUP, LLP

2
3 By: 

4 Heather Davis
5 *Attorneys for Plaintiff*

6 Dated: 6/17/2026

MORGAN, LEWIS, & BOCKIUS, LLP

8 By: s/Michelle Quach

9 Andrew Frederick
10 Michelle Quach
11 *Attorneys for Plaintiff*