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Additional Parties Lised on Next Page

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

BECKY VU, an individual,

Plaintiff,

vs.

BUZZFEED INC., a Delaware corporation;
LINDSAY WEBSTER, an individual; and
DOES 1-100, inclusive,

Defendant(s).

Case No. 25STCV01425

Assigned to the Honorable Jeffrey D.
McFarland, Department 617

**STIPULATION FOR AN ORDER
APPROVING RELEASE AND
DISMISSAL WITHOUT PREJUDICE OF
PLAINTIFF’S CLAIM FOR PENALTIES
AND INTEREST PURSUANT TO THE
PRIVATE ATTORNEY’S GENERAL ACT
(“PAGA”); [PROPOSED] ORDER
THEREON**

Complaint Filed: January 21, 2025
Trial Date: Stayed.

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15 Telephone: 213.443.4300
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17 Attorneys for Defendants
18 BUZZFEED INC. and LINDSAY WEBSTER
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1 **STIPULATION FOR SETTLEMENT AND DISMISSAL OF PAGA CLAIM**

2 The Parties, by and through their respective counsel of record, Peggy A. Farrell, attorney
3 for Plaintiff BECKY VU (“Plaintiff”), Steven A. Groode and Matthew W. Morris of Littler
4 Mendelson, P.C., attorneys for Defendants BUZZFEED INC. and LINDSAY WEBSTER
5 (“Defendants”) hereby stipulate and jointly apply for an Order from the Court approving the
6 release and dismissal without prejudice of Plaintiff’s claim for Penalties and Interest Pursuant to
7 the California Attorney General’s Act of 2004 [Labor Code §§ 2699, *et seq.*] (11th Cause of
8 Action to Complaint) (“PAGA Claim”).

9 **STIPULATION**

10 1. WHEREAS, on January 19, 2025, Plaintiff filed suit against Defendants alleging
11 thirteen causes of action for violations of the FEHA for discrimination based on race/color,
12 national origin and association with a protected class (Gov’t Code § 12940(a)), retaliation for
13 opposing/reporting discrimination and retaliation (§ 12940(h)), failure to prevent discrimination
14 and retaliation from occurring (§ 12940(k)); for violations of the California Labor Code
15 including retaliation for exercise of rights (§ 98.6), retaliation for disclosing working conditions
16 (§ 232.5(c)), imposition of unlawful policies or procedures to silence whistleblowers (§§
17 1102.5(a) and 232.5(a)), retaliation for disclosure and refusal to participate in conduct reasonably
18 believed too violate state or federal law, rule or regulation (§ 1102.5(b)-(c)); contract in violation
19 of public policy (Cal. Civ. Code § 1668), unfair business practices in violation of Cal. Bus. &
20 Prof. Code §§ 17200, *et seq.*, wrongful constructive termination in violation of public policy and
21 intentional infliction of emotional distress. Plaintiff’s 11th Cause of Action alleges penalties on
22 behalf of herself and all other employees similarly aggrieved pursuant to the California Private
23 Attorney’s General Act of 2004 (Cal. Labor Code § 2699, *et seq.*) based on predicate violations
24 of Labor Code §§ 98.6, 232.5(a) and (c) and 1102.5(a)-(c); are collectively referred to as the
25 “Action.”

26 2. WHEREAS, Defendants deny these allegations in their entirety and deny any
27 liability whatsoever to Plaintiff or any other individual.

28 3. WHEREAS, on July 12, 2026, the Parties participated in a private mediation with
David Phillips;

 4. WHEREAS, Defendant denies all material allegations set forth in the Action and

has asserted numerous affirmative defenses. Notwithstanding, in the interest of avoiding further litigation, Defendant desires to fully and finally settle all claims and contentions of the Parties (the “Confidential Settlement”);

5. WHEREAS, the Parties reached the Confidential Settlement solely on the basis of Plaintiff’s individual, non-PAGA claims and did not allocate any portion of the confidential settlement proceeds to the PAGA Claim on the grounds that (1) no PAGA discovery was conducted and therefore there was no identifiable representative group of similarly aggrieved employees; (2) nor were any facts or theories related to the PAGA Claim were proffered in conjunction with or in consideration of reaching the Confidential Settlement; (3) the Action is primarily based on Plaintiff’s FEHA Claims for discrimination, retaliation and associated claims for emotional distress damages, punitive damages, and statutory attorney’s fees. Further, Plaintiff acknowledges that it is unlikely that Plaintiff would recover PAGA penalties for the Labor Code claims plead.

6. WHEREAS, because no part of the settlement payment under the Settlement terms is allocated to the PAGA Claim, for the reasons stated above, Plaintiff requests that the Court release and dismiss, without prejudice, her claim for Penalties and Interest Pursuant to PAGA (11th Cause of Action). Plaintiff will file a second dismissal with respect to her individual claims, with prejudice.

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1 7. Based on the foregoing, the Parties hereby request a Court order approving the
2 release and dismissal of the PAGA Claim in the manner set forth above.

3 **SO STIPULATED.**

4 Dated: September 15, 2026

LAW OFFICE OF PEGGY A. FARRELL ^{APC}

6 Signed: Peggy Farrell
7 Peggy A. Farrell
8 Attorney for Plaintiff BECKY VU

9 Dated: September 15, 2026

LITTLER MENDELSON, PC

10 Signed: Matthew Morris
11 Matthew Morris
12 Attorney for Defendants BUZZFEED, et al.

1 **[PROPOSED] ORDER**

2 Good Cause being hereby shown, the Court hereby orders the release and dismissal
3 without prejudice of Plaintiff's 11th Cause of Action for Penalties and Interest Pursuant to the
4 California Attorney General's Act of 2004 [Labor Code §§ 2699, *et seq.*].

5 **IT IS SO ORDERED.**

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7 Dated: _____

Signed: _____

8 Hon. Judge Jeffrey D. McFarland
9 Judge of the Los Angeles Superior Court

PROOF OF SERVICE
Vu v. BuzzFeed, et al.
LASC Case No. 25STCV01425

I, the undersigned, am over the age of eighteen years and am resident of Los Angeles County, California; I am not a party to the above-entitled action; my business mailing address is 3154 Glendale Blvd., #1175, Los Angeles, CA 90039.

On September 15, 2026, I served the following document(s):

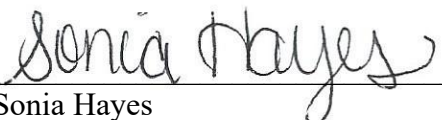
**STIPULATION FOR AN ORDER APPROVING RELEASE AND DISMISSAL
WITHOUT PREJUDICE OF PLAINTIFF'S CLAIM FOR PENALTIES AND INTEREST
PURSUANT TO THE PRIVATE ATTORNEY'S GENERAL ACT ("PAGA");
PROPOSED ORDER**

X BY EMAIL: In accordance with CCP § 1010.6(e), I caused the document(s) identified above to be served via email as follows:

Matt Morris
MaMorris@Littler.com
Steven A. Groode
SGroode@Littler.com
Littler Mendelson, PC
2049 Century Park East, 5th Floor
Los Angeles, CA 90067

Executed on September 15, 2026 from Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Sonia Hayes

PROOF OF SERVICE