

1
2
3 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
4 **FOR THE COUNTY OF KERN**

5 DULCE MARIA SANTACRUZ SANCHEZ
6 and SALUD SANTACRUZ, individuals on
7 behalf of themselves, the State of California,
8 as private attorneys general, and on behalf of
9 all others similarly situated,

10 Plaintiffs,

11 v.

12 GOLDEN LABOR SERVICES, LLC, a
13 California Limited Liability Company;
14 PACIFIC AG MANAGEMENT, INC., a
15 California Corporation; and DOES 1 TO 50,

16 Defendants.

CASE NO.: BCV-20-102729

AMENDMENT TO SETTLEMENT
AGREEMENT AND RELEASE OF CLASS
ACTION

1 This shall serve as an amendment to the **Settlement Agreement and Release of Class Action**
2 (“Settlement Agreement”) entered into on December 13, 2021, between Plaintiffs Dulce Maria
3 Santacruz Sanchez and Salud Santacruz (“Plaintiffs”), on the one hand, individually, as representatives
4 of the Settlement Class and as representatives of the State of California and Aggrieved Employees, by
5 and through their counsel of record Melmed Law Group, P.C. (“Class Counsel”), and Defendants
6 Golden Labor Services, LLC and Pacific Ag Management, Inc. (“Defendants”) on the other hand, by
7 and through their counsel of record, Coleman & Horowitz, LLP and Belden Blaine Raytis, LLP,
8 respectively. Plaintiffs and Defendants are collectively referred to as “the Parties”. All other settlement
9 terms remain the same.

10 The following provisions of the Settlement Agreement are hereby amended as follows:

11 **I. DEFINITIONS**

12 **1.10. CLASS PERIOD.** “Class Period” shall mean the period from November 20, 2016,
13 through October 31, 2021.

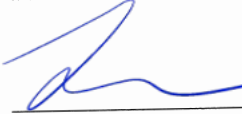
14 **1.31. PAGA PERIOD.** “PAGA Period” shall mean the period from November 20, 2019,
15 through October 31, 2021.

16 The Parties knowingly and voluntarily agree to the aforementioned amended terms.

17
18 **CLASS COUNSEL:**

19
20 Dated: June 28, 2022

MELMED LAW GROUP P.C.

21 
22 _____
23 Jonathan Melmed
24 Attorneys for Plaintiffs
25
26
27
28

1 **DEFENDANTS' COUNSEL:**

2
3 Dated: JUNE 27, 2022

COLEMAN & HOROWITT, LLP

4
5 
6 Gregory J. Norys
7 Attorneys for Defendant Golden Labor Services,
8 LLC

9
10 Dated: June 28, 2022

BELDEN BLAINE RAYTIS, LLP

11
12 
13 T. Scott Belden
14 Attorneys for Defendant Pacific AG
15 Management, Inc.
16
17
18
19
20
21
22
23
24
25
26
27
28