

Electronically Received 10/07/2024 04:25 PM

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9 GISELLE CONTRERAS, on behalf of herself
10 and all others similarly situated

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FILED
Superior Court of California
County of Los Angeles
10/18/2024

David W. Slayton, Executive Officer / Clerk of Court
By: I. Arellanes Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

12 GISELLE CONTRERAS, on behalf of herself
13 and all others similarly situated,

14 Plaintiffs,

15 v.

16 RALPHS GROCERY COMPANY, an Ohio
17 corporation; and DOES 1 through 100,
18 Inclusive

19 Defendants

CASE NO.: 19STCV25576

[Assigned for All Purposes to Hon. Kenneth R. Freeman - Dept. 14]

**JOINT STIPULATION FOR COURT
APPROVAL OF INCREASED COST OF
SETTLEMENT ADMINISTRATION;
~~PROPOSED~~ ORDER**

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Attorneys for Plaintiffs, the Class, the LWDA, and the Aggrieved Employees

1 **JOINT STIPULATION FOR COURT APPROVAL OF INCREASED COST OF**
2 **SETTLEMENT ADMINISTRATION**

3 Plaintiffs Giselle Contreras, Angela McCorkle, Amy Rodriguez, Tiffany Bechere, Amber
4 Barba, Monica Smith, and Susan E. Kawai-Way (“Plaintiffs”) and Defendant Ralphs Grocery
5 Company (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of
6 record, hereby stipulate and agree as follows:

7 **WHEREAS**, on July 30, 2024, the Court entered the Order Granting Final Approval of
8 Class Action Settlement, Application for Attorneys’ Fees and Costs, and Enhancement Award
9 (“Order”).

10 **WHEREAS**, the Order approved settlement administration costs in the amount of
11 \$220,000 to CPT Group, Inc. (“CPT”).

12 **WHEREAS**, as reported in the Supplemental Declaration of Tarus Dancy on Behalf of
13 CPT filed on July 3, 2024, CPT requests Court approval of an extra \$30,000 in settlement
14 administration costs to cover the increased costs associated with: (1) postal mailing rates; (2) the
15 difference between the number of Class Members and PAGA Employees estimated at preliminary
16 approval (58,000 Class Members / 32,00 PAGA Employees) and ultimately ascertained once the
17 Class List was produced (62,288 Class Members and 32,454 PAGA Employees); (3) the cost of
18 translating the Class Notice into Spanish; and (4) the cost associated with the escheatment process
19 (e.g., accounting and reporting costs) of unclaimed funds the California State Controller Office.

20 **WHEREAS**, the settlement agreement budgeted up to \$185,000 for Class Counsel’s
21 litigation costs and expenses. However, Class Counsel sought only \$147,310.97 in litigation costs
22 and expenses, which the Court awarded. The difference of \$37,689.03 is more than sufficient to
23 cover the increased cost of settlement administration sought by CPT.

24 **ACCORDINGLY, IT IS HEREBY STIPULATED**, subject to Court approval, the
25 Parties are agreeable to allocating the unused budget of Class Counsel’s litigation costs to pay for
26 the increased cost of settlement administration.

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IT IS SO STIPULATED.

Dated: October 7, 2024

CLASS COUNSEL

By: /s/Craig J. Ackermann

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Amber Barba, Monica Smith, and Susan E.
Kawai-Way*

Dated: October 7, 2024

DEFENSE COUNSEL

By: /s/Mara Curtis

Mara Curtis
REED SMITH LLP

*Attorneys for Defendant Ralphs Grocery
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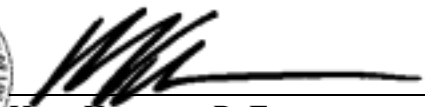
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ORDER

Based on the Parties' stipulation, and **GOOD CAUSE** having been shown, the Court hereby approves settlement administration costs of up to \$250,000 to CPT Group, Inc.

IT IS SO ORDERED.

Dated: 10/18/2024



HON. KENNETH R. FREEMAN
LOS ANGELES COUNTY SUPERIOR COURT JUDGE
Kenneth R. Freeman/Judge

PROOF OF SERVICE
STATE OF CALIFORNIA

I am over the age of 18 years and am employed in the county of Los Angeles, State of California. I am not a party to this action. My business address is 315 South Beverly Drive, Suite 504, Beverly Hills, California 90211.

I declare that on the date hereof, October 7, 2024, I served the following document(s) described as:

- **JOINT STIPULATION FOR COURT APPROVAL OF INCREASED COST OF SETTLEMENT ADMINISTRATION; [PROPOSED] ORDER**

on the interested parties in this action as follows:

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7 **X (By Electronic Service – CaseAnywhere)** By uploading a true and correct copy of the
8 above-referenced document(s) to the CaseAnywhere website page pertaining to this action,
9 pursuant to the Court’s order authorizing electronic service in the action through
10 CaseAnywhere.com, for service to the above parties at the email addresses listed herein. I did not
11 receive, within a reasonable time after the upload/transmission, any electronic message or other
12 indication that the upload/transmission was unsuccessful.

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20 **X (By Electronic Service)** Based on a court order, local rule, or agreement of the parties to
21 accept service by email or electronic transmission, I caused the documents to be sent to the
22 person(s) at the email address(es) listed hereinabove. I did not receive, within a reasonable time
23 after the transmission, any electronic message or other indication that the transmission was
24 unsuccessful.

25 I declare under penalty of perjury pursuant to the laws of the State of California that the
26 foregoing is true and correct. I further declare that I am employed in the office of a member of the
27 bar of this court at whose direction the service was made.

28 Executed on October 7, 2024 in Beverly Hills, California.



Jaelyn Blackwell