

1 **COHELAN KHOURY & SINGER**
Michael D. Singer, Esq. (SBN 115301)
2 Email: msinger@ckslaw.com
Diana M. Khoury (SBN 128643)
3 Email: dkhoury@ckslaw.com
Kristina De La Rosa, Esq. (SBN 279821)
4 Email: kdelarosa@ckslaw.com
605 C Street, Suite 200
5 San Diego, CA 92101
Tel: (619) 595-3001
6 Fax: (619) 595-3000

7 Attorneys for Plaintiff RICHARD SNOW

8 *[Additional Counsel Listed on Next Page]*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **IN AND FOR THE COUNTY OF SAN BERNARDINO**

11 RICHARD SNOW, individually and on
behalf of others similarly-situated and
12 aggrieved employees,

13 Plaintiff,

14 vs.

15 WATKINS AND SHEPARD TRUCKING,
INC., a Montana Corporation; and DOES 1
16 through 10, inclusive,

17 Defendants.

[PROPOSED LEAD]
CASE NO. CIVDS1823509

[PROPOSED COORDINATED]
CASE NO. CIVDS1826457

[PROPOSED COORDINATED]
CASE NO. CIVDS1929857

[All Assigned to Hon. David Cohn, Dept. S26]

**JOINT STIPULATION RE: CORRECTION
OF ERROR IN PARAGRAPH 17 OF
STIPULATION FOR SETTLEMENT AND
RELEASE OF CLASS AND
REPRESENTATIVE ACTION CLAIMS,
CONDITIONAL CONSOLIDATION OF
CASES FOR SETTLEMENT PURPOSES,
AND LEAVE TO CONDITIONALLY FILE
CONSOLIDATED COMPLAINT FOR
SETTLEMENT PURPOSES**

18
19 ALLAN ORTEGA, on behalf of himself, all
others similarly situated and on behalf of the
20 general public,

21 Plaintiff,

22 vs.

23 WATKINS AND SHEPARD TRUCKING,
INC.; and DOES 1 through 100, inclusive,

24 Defendants.
25

26 WILLIE GERMANY, an individual, on
27 behalf of himself and others similarly situated,
28 Plaintiff,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

vs.

WATKINS AND SHEPARD TRUCKING,
INC.; SCHNEIDER NATIONAL
CARRIERS, INC.; and DOES 1 thru 50,
inclusive,
Defendants.

1 **MARA LAW FIRM PC**
David Mara, Esq. (SBN 230498)

2 E-mail:
3 Jamie Serb, Esq. (SBN 289601)

4 E-mail:
Tony Roberts, Esq. (SBN 315595)

5 E-mail:
2650 Camino Del Rio North, Suite 205
6 San Diego, CA 92108
Tel: 619.234.2833
Fax: 619.234.4048

7 Attorneys for Plaintiff ALLAN ORTEGA

8 **KINGSLEY & KINGSLEY, APC**

9 Eric B. Kingsley, Esq. (SBN 185123)
Email: eric@kingsleykingsley.com
10 Liane Katzenstein Ly, Esq. (SBN 259230)
Email: liane@kingsleykingsley.com

11 Ari J. Stiller, Esq. (SBN 294676)
Email: ari@kingsleykingsley.com

12 16133 Ventura Blvd., Suite 1200
Encino, CA 91436
13 Tel: (818) 990-8300
Fax: (818) 990-2903

14 Attorneys for Plaintiff WILLIE GERMANY

15
16 **MCGUIREWOODS LLP**

17 Matthew C. Kane, Esq. (SBN 171829)
Email: mkane@mcguirewoods.com
18 Sabrina A. Beldner, Esq. (SBN 221918)
Email: sbeldner@mcguirewoods.com

19 Amy E. Beverlin, Esq. (SBN 284745)
Email: abeverlin@mcguirewoods.com

20 1800 Century Park East, 8th Floor
Los Angeles, CA 90067-1501

21 Tel: (310) 315-8200
Fax: (310) 315-8210

Sylvia J. Kim (SBN 258363)
Email: skim@mcguirewoods.com
2 Embarcadero Center, Suite 1300
San Francisco, CA 94111
Telephone: 415.844.9944
Facsimile: 415.844.9922

22 Attorneys for Defendant WATKINS & SHEPARD TRUCKING, INC.
23
24
25
26
27
28

1 This stipulation is entered into by and between Plaintiffs Richard Snow, Allan Ortega, and
2 Willie Germany, and Defendant Watkins & Shepard Trucking, Inc. (collectively the “Parties”),
3 through their respective counsels of record, for purposes of correcting a typographical error in their
4 Stipulation for Settlement and Release of Class and Representative Action Claims, Conditional
5 Consolidation of Cases for Settlement Purposes, and Leave to Conditionally File Consolidated
6 Complaint for Settlement Purposes (the “Settlement Agreement” or “Agreement”).

7 WHEREAS, on or about December 16, 2020, the Parties executed the Settlement
8 Agreement;

9 WHEREAS, after executing the Agreement, counsel noticed a typographical error in
10 Paragraph 17(c), establishing the Germany Gross Settlement Fund, in which the phrase “Ortega
11 Settlement Class” is mistakenly used instead of “Germany Settlement Class.”

12 NOW THEREFORE, to correct this error, the parties hereby stipulate and agree that
13 Paragraph 17(c) will be amended as follows:

14 c. The Germany Gross Settlement Fund: The agreed upon total amount
15 in full and final settlement of the Released Claims (as defined below) of the ~~Ortega~~
16 ~~Germany~~ Settlement Class is One Hundred Forty-Five Thousand Dollars
17 (\$145,000.00) (the “Germany GSF”). The Germany GSF is inclusive of all
18 payments to be made in settlement of the Action to Germany, the LWDA, all
19 ~~Ortega~~ ~~Germany~~ Settlement Class Members, and their counsel for individual,
20 private attorney general, and class-wide relief. None of the Germany GSF will be
21 payable by Defendant prior to final approval by the Court of the settlement,
22 occurrence of the Effective Date of the settlement as defined below, and the
23 occurrence of all other conditions precedent as set forth in this Agreement as
24 approved by the Court, provided all such conditions occur prior to the Effective
25 Date.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: February 23, 2021

COHELAN KHOURY & SINGER



By: _____

Michael D. Singer, Esq.
Kristin De La Rosa, Esq.

Attorneys for Plaintiff Richard Snow

DATED: February 23, 2021

MARA LAW FIRM, PC



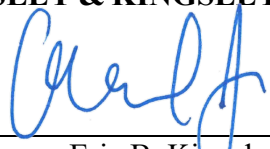
By: _____

David Mara, Esq.
Matthew Crawford, Esq.

Attorneys for Plaintiff Allan Ortega

DATED: February 23, 2021

KINGSLEY & KINGSLEY, APC



By: _____

Eric B. Kingsley, Esq.
Ari J. Stiller, Esq.

Attorneys for Plaintiff Willie Germany

DATED: _____, 2021

MCGUIREWOODS LLP

By: _____

Matthew C. Kane, Esq.
Sabrina A. Beldner, Esq.
Sylvia J. Kim, Esq.
Amy E. Beverlin, Esq.

Attorneys for Defendant Watkins & Shepard
Trucking, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: _____, 2021

COHELAN KHOURY & SINGER

By: _____
Michael D. Singer, Esq.
Kristin De La Rosa, Esq.

Attorneys for Plaintiff Richard Snow

DATED: _____, 2021

MARA LAW FIRM, PC

By: _____
David Mara, Esq.
Tony Roberts, Esq.

Attorneys for Plaintiff Allan Ortega

DATED: _____, 2021


KINGSLEY & KINGSLEY, APC

By: _____
Eric B. Kingsley, Esq.
Ari J. Stiller, Esq.

Attorneys for Plaintiff Willie Germany

DATED: February 23, 2021

MCGUIREWOODS LLP

By:  _____
Matthew C. Kane, Esq.
Sabrina A. Beldner, Esq.
Sylvia J. Kim, Esq.
Amy E. Beverlin, Esq.

Attorneys for Defendant Watkins & Shepard
Trucking, Inc.
