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16 Attorneys for Defendant
SANTA MONICA SEAFOOD COMPANY

18 SUPERIOR COURT OF CALIFORNIA

19 FOR THE COUNTY OF LOS ANGELES

20 LIZETTE FLORES, individually, and on behalf
of other aggrieved employees pursuant to the
21 California Private Attorneys' General Act,

22 Plaintiff,

23 vs.

24 SANTA MONICA SEAFOOD COMPANY, a
California corporation; and DOES 1 through
25 100, inclusive,

26 Defendants.

Case No. BC697666

**FIRST AMENDMENT TO JOINT
STIPULATION OF CLASS ACTION
SETTLEMENT AND RELEASE OF
CLAIMS**

1 Plaintiff, Lizette Flores ("Plaintiff"), and Defendant, Santa Monica Seafood Company
2 ("Defendant") (collectively, the "Parties"), in consideration of mutual promises and covenants,
3 hereby agree to amend and modify their Joint Stipulation of Class Action Settlement and Release of
4 Claims, as follows:

5 **RECITALS**

6 1. Plaintiff and Defendant entered into a Joint Stipulation of Class Action Settlement
7 and Release of Claims (the "Stipulation") on or about January 31, 2020.

8 2. Sections III.S. and III.V. of the Stipulation provide, respectively, that "The Parties
9 and their counsel will cooperate with each other and use their best efforts to effect the
10 implementation of the Settlement," and "This Agreement may be amended or modified only by a
11 written instrument signed by counsel for all Parties or their successors-in-interest."

12 3. The current Los Angeles County Superior Court closures and Court-ordered
13 continuances of non-essential hearings due to the COVID-19 crisis may delay the Preliminary
14 Approval Hearing currently scheduled for April 30, 2020, contrary to the mutual interests and
15 original intent of the Parties.

16 4. Counsel whose signatures appear below represent and warrant that they are expressly
17 authorized by the Parties whom they represent to negotiate and enter into this First Amendment to
18 Joint Stipulation of Class Action Settlement and Release of Claims.

19 **NOW, THEREFORE**, the Parties hereby agree to amend and modify the Stipulation as
20 follows and in no other respects:

21 1. The definition of "Class" in Section I.C. on page 1, line 12, shall be amended to strike
22 "the date the Court grants preliminary approval of the proposed settlement" and replace it with
23 "April 30, 2020."

24 2. The definition of "Class Period" in Section I.I. on page 2, lines 4-5, shall be amended
25 to strike "preliminary approval of the settlement" and replace it with "April 30, 2020."

26 3. The definition of "PAGA Member" in Section I.X. on page 4, lines 8-9, shall be
27 amended to strike "the date the Court grants preliminary approval of the proposed settlement" and
28 replace it with "April 30, 2020."

1 4. The definition of "PAGA Period" in Section I.Y. on page 4, lines 10-11, shall be
2 amended to strike "the date of preliminary approval of the settlement" and replace it with "April 30,
3 2020."

4 5. Section III.N.1. shall be amended to strike "the date of preliminary approval" on page
5 18, line 2, and replace it with "April 30, 2020."

6 6. Section III.N.1.(f) shall be amended to strike "the date of the Preliminary Approval
7 Date" on page 23, line 16, and replace it with "April 30, 2020."

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9 Dated: April 6, 2020

PROTECTION LAW GROUP, LLP

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By: 
AMIR NAYEBDADASH
Attorney for Plaintiff

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Dated: April 3, 2020

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By: 
DWIGHT L. ARMSTRONG
Attorneys for Defendant
SANTA MONICA SEAFOOD COMPANY

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