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FILED
Superior Court of California
County of Los Angeles
12/22/2023

David W. Slayton, Executive Officer / Clerk of Court
By: _____ A. He _____ Deputy

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8 Attorneys for Plaintiffs DESHONE BUSBY and STEPHANIE HERRERA,
9 on behalf of themselves and all others similarly situated

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

13
14 DESHONE BUSBY and STEPHANIE
15 HERRERA, individually and on behalf of
16 all others similarly situated,

Case No. 21STCV01413

Assigned for All Purposes to:
Hon. Stuart M. Rice

17 Plaintiffs,

18 vs.

**STIPULATION AND ~~PROPOSED~~
ORDER APPROVING NOTICE TO THE
CERTIFIED CLASS AND APEX CLASS
ACTION, LLC AS NOTICE
ADMINISTRATOR**

19 MMD, INC, a California Corporation,
20 CANTODIEM DISPENSING
21 COLLECTIVE, INC., a California
22 Corporation, CALIFORNIA
23 COMPASSIONATE CARE NETWORK,
24 INC., a California Corporation, NHS
25 COLLECTIVE, a California Corporation,
26 and DOES 1 through 50, inclusive,

Complaint Filed: January 13, 2021

27 Defendants.
28

Electronically Received 12/20/2023 05:16 PM

1 Plaintiffs Deshone Busby and Stephanie Herrera (collectively, “Plaintiffs”) and
2 Defendants MMD, Inc., Cantodiem Dispensing Collective, Inc., California Compassionate Care
3 Network, Inc. and NHS Collective (collectively, “Defendants”), through their respective
4 counsel of record, submit this Stipulation and Proposed Order requesting approval of the
5 attached notice to the Class certified on November 29, 2023, giving them notice of the action
6 and the option of opting out of the certified class. The Parties stipulate and agree as follows:

7 1. The proposed Notice of Class Certification is attached hereto as **Exhibit 1**. The
8 proposed Request for Exclusion form and Change of Address forms are attached hereto as
9 **Exhibits 2 and 3**, respectively. The Parties request the Court’s approval of the Notice, the
10 Request for Exclusion, and Change of Address Forms in connection with this Stipulation.
11 Exhibits 1-3 are collectively referred to as the “Notice Packet” or “Notice” herein.

12 2. If approved, the Notice Packet will be mailed and/or emailed out to members of the
13 Certified Class at their last known mailing address via First Class U.S. Mail and/or email
14 address as set forth herein.

15 3. Within five (5) business days of the Court’s entry of an order approving this Stipulation
16 and the proposed Notice, Defendants will send a list of all members of the Certified Class to the
17 Notice Administrator, including the individual’s full name, last known address, telephone
18 number, and last known email address.

19 4. Within five (5) business days of receipt of the list of all members of the Certified Class,
20 the administrator shall mail and/or email the Notice Packet to members of the Certified Class at
21 their last known address or email address. Before mailing, the Notice Administrator shall
22 conduct a National Change of Address database search to update the addresses as accurately as
23 possible.

24 5. Any Notices returned to the Notice Administrator before the response deadline set forth
25 in the Notice will promptly be re-mailed by First Class U.S. mail to the forwarding address, if
26 provided, and the Notice Administrator will indicate the date of re-mailing on the Notice. If no
27 forwarding address is provided, the Notice Administrator will promptly attempt to determine
28 the correct address using a skip-trace or other search using the name, address, and/or social

1 security number of the Class or Subclass Member and will re-mail the Notice to the updated
2 address one additional time.

3 6. Class Members may request exclusion from the class action by completing and
4 submitting a Request for Exclusion form to the Notice Administrator within forty-five (45) days
5 of the initial mailing (as set forth in the Notice).

6 7. Class Members who receive a re-mailed Notice will have the later of: (1) an additional
7 fifteen (15) calendar days, or (ii) the response deadline (as set forth in the Notice) to postmark
8 or fax a Request for Exclusion Form.

9 8. Any Class Member who submits a valid and timely Request for Exclusion Form will
10 retain any rights they may currently have against Defendants regarding the certified claims at
11 issue in this lawsuit and will not be bound by the decisions of the Court in this lawsuit, however
12 they will not be entitled to share in any recovery by way of judgment or settlement that is
13 obtained for the Class or Subclass. The parties may permit Class Members who have excluded
14 themselves from the Class to later opt-in to any settlement, if any.

15 9. Class Members who do not submit a valid and timely Request for Exclusion Form will
16 remain part of the Class and will be bound by the decisions of the Court in this lawsuit and may
17 be entitled to share in any recovery by way of judgment or settlement that is obtained for the
18 Class, if any.

19 10. Within five (5) business days of the deadline for Class Members to request exclusion
20 from the Class, the Notice Administrator shall provide such Class Members' contact information
21 (including name, last known address, telephone number, and any known personal e-mail
22 address) to Plaintiffs' counsel.

23 11. The Parties jointly request that the Court approve Apex Class Action, LLC to perform
24 the mailing, collect Request for Exclusion forms and change of address forms, and to provide
25 Plaintiffs' counsel with the name and contact information for all members of the Certified Class
26 who do not timely opt out. In addition, the Notice Administrator shall, upon request of counsel,
27 prepare a report under oath of the mailing process and collection of opt outs.

28 12. The Parties will share equally in the Notice Administrator's costs associated with the

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distribution of the Notice.

Dated: December 20, 2023

FARNAES & LUCIO, APC

By: /s/ Mitchell J. Murray
Malte L. L. Farnaes
Christina M. Lucio
Mitchell J. Murray

Attorneys for Plaintiffs and the certified
Class and Subclasses

Dated: December 20, 2023

THE FREEDMAN FIRM PC

By: /s/ Michael Freedman
Michael Freedman

Attorney for Defendants

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DESHONE BUSBY and STEPHANIE
HERRERA, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

MMD, INC, a California Corporation,
CANTODIEM DISPENSING
COLLECTIVE, INC., a California
Corporation, CALIFORNIA
COMPASSIONATE CARE NETWORK,
INC., a California Corporation, NHS
COLLECTIVE, a California Corporation,
and DOES 1 through 50, inclusive,

Defendants.

Case No. 21STCV01413

Assigned for All Purposes to:
Hon. Stuart M. Rice

**~~PROPOSED~~ ORDER APPROVING NOTICE
OF CLASS CERTIFICATION AND NOTICE
ADMINISTRATOR**

Complaint Filed: January 13, 2021

1 Before the Court is a Stipulation approving the Notice of Class Certification to be sent to
2 the certified Class, and appointing Apex Class Action, LLC as Notice Administrator (the
3 “Stipulation”), jointly submitted by Plaintiffs Deshone Busby and Stephanie Herrera
4 (“Plaintiffs”) and Defendants MMD, Inc., Cantodiem Dispensing Collective, Inc., California
5 Compassionate Care Network, Inc., and NHS Collective (“Defendants”) (collectively, the
6 “Parties”). Having reviewed the Stipulation, and good cause appearing therefor, the Court
7 hereby APPROVES the Stipulation and ORDERS as follows:

8 1. The Notice of Class Certification (“Class Notice”) attached hereto as
9 **Exhibit 1** is approved for distribution to members of the Class, as defined in the Court’s Order
10 Granting Plaintiffs’ Motion for Class Certification issued on November 29, 2023.

11 2. Apex Class Action, LLC is approved to administer the Class Notice to the
12 Class Members.

13 3. The Class Notice shall be distributed to the Class Members by Reed as Agent.

14 4. Class Members shall have a response deadline forty-five (45) days from the
15 mailing of the Notice to request exclusion from the Class, except to those Class Members whose
16 notice is re-mailed, who will have the later of: (1) an additional fifteen (15) calendar days, or
17 (ii) the original response deadline.

18
19 IT IS SO ORDERED.

20
21 DATED: 12/22/2023



A handwritten signature in black ink that reads 'Stuart M. Rice'.

Stuart M. Rice / Judge

Hon. Stuart M. Rice
Judge of the Superior Court, County of Los Angeles

Exhibit 1

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

NOTICE OF CLASS CERTIFICATION

If you were employed by MMD, Inc., Cantodiem Dispensing Collective, Inc., Compassionate Care Network, Inc., or NHS Collective as a non-exempt, hourly employee in the State of California at any time from January 13, 2017 through November 29, 2023, a class action lawsuit may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer. You are not being sued.

Please Read This Notice Carefully.

A class action lawsuit is pending in the Superior Court of California, County of Los Angeles (“the Court”) against MMD, Inc., Cantodiem Dispensing Collective, Inc., Compassionate Care Network, Inc., and NHS Collective (“Defendants”). The case is entitled *Deshone Busby, et al. v. MMD, Inc., et al.*, Case No. 21STCV01413. The lawsuit alleges that Defendants failed to pay all lawful wages, failed to provide lawful meal periods, failed to authorize and permit lawful rest breaks, failed to reimburse business expenses, failed to provide accurate and itemized wage statements, failed to timely pay all wages due during and upon separation from employment, and violated Business and Professions Code §§ 17200, *et seq.* (the “Unfair Competition Law”). The lawsuit also seeks civil penalties for these violations under Labor Code § 2698 *et seq.* (the Private Attorney General Act, or “PAGA”).

The Court has allowed certain of Plaintiffs’ claims to proceed as a class action and certified the following Class: all current and former non-exempt, hourly employees of Defendants in California at any time from January 13, 2017 through November 29, 2023 (the “Class”).

The Court has permitted Plaintiffs to pursue class-wide relief for Defendants’ alleged failure to: (1) pay all lawful wages including minimum wages and overtime wages; (2) provide lawful meal periods; (3) authorize and permit rest periods; (4) furnish accurate and itemized wage statements; (5) pay all wages due at separation from employment; (6) reimburse necessary business expenses; and (7) violations of business and professions code. Specifically, Plaintiffs contend that Defendants failed to pay minimum wage for all hours worked because Plaintiffs and Class Members were required to perform work off-the-clock. Plaintiffs also contend that Defendants failed to provide meal periods or authorize and permit rest periods, in part, because Defendants lack of training, understaffing, work demands, and lack of scheduling resulted in Plaintiffs and Class Members having their meal and rest periods pushed late, cut short, interrupted, or foregone entirely, and Defendants failed to pay meal or rest period premiums. Further, Plaintiffs contend that Plaintiffs and the Class Members incurred expenses in the course of their work that were necessary to performing their duties, but were not reimbursed for such expenses. Plaintiffs also contend that Defendants failed to provide accurate itemized wage statements because, as a result of the alleged failure to pay minimum wage for all hours worked, the wage statements did not accurately itemize the hourly rates and wages earned for straight time wages, overtime pay, and meal and rest break premiums. Plaintiffs contend that Defendants failed to pay all wages due upon separation from employment both as a result of aforementioned failures to pay minimum wage for all hours worked, overtime pay, meal and rest period premiums, and also direct violations for failing to pay final wages to Plaintiffs and Class Members on the day of termination, or within 72 hours for employees who resign without sufficient notice. Finally, Plaintiffs seek penalties pursuant to Business and Professions Code §§ 17200, *et seq.* and Labor Code § 2698 *et seq.* based on the above violations.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING – REMAIN IN THE CLASS	<p>Stay in the lawsuit. Await the Outcome. Share in possible benefits. Give up certain rights.</p> <p>By doing nothing, you are choosing to stay in the Class. You will be represented by the Plaintiffs and their attorneys, your rights will be determined in this case, and you will be bound by the decisions in the case.</p> <p>By doing nothing, you keep the possibility of getting money that may come from a judgment or settlement. But, you will give up your rights to sue Defendants in a separate lawsuit for the claims made in this class action.</p>
EXCLUDE YOURSELF	<p>Get out of this lawsuit. Get no benefits. Keep any rights that you may have.</p> <p>If you opt out of the Class (meaning you say in writing that you do <u>not</u> want to be included in this lawsuit), you will <u>not</u> be entitled to any recovery that may result from this Class Action, but you will <u>not</u> be bound by any past or future rulings against Defendants. You will be free to pursue your own claims against the Defendants on your own or as part of a different lawsuit and may hire a separate lawyer to do so.</p> <p>If you are considering excluding yourself from the class, please note that there may be a risk that any new claims asserted against Defendants may no longer be timely and may be time barred.</p>

Basic Information About the Lawsuit

1. Why did I get this notice?

Records show that you worked for one or more of the Defendants at some point between January 13, 2017 and November 29, 2023 (the “Class Period”) as a non-exempt, hourly employee in California. This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial. The trial is to decide whether the claims being made against the Defendants, on your behalf, are correct. Judge Stuart M. Rice of the Superior Court of California, County of Los Angeles is overseeing this class action. The case is known as *Deshone Busby, et al. v. MMD, Inc., et al.* Case No. 21STCV01413.

2. What is this lawsuit about?

Plaintiffs allege that Defendants failed to pay minimum wages for all hours worked, failed to pay overtime pay, failed to provide meal periods, failed to authorize and permit rest periods, failed to pay meal or rest period premiums, failed to furnish accurate and itemized wage statements, failed to pay all wages due at separation

from employment, failed to reimburse necessary business expenses, and violated Business and Professions Code §§ 17200, *et seq.* and Labor Code § 2698 *et seq.* Defendants deny any wrongdoing.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” In this case, there are two Class Representatives, Deshone Busby and Stephanie Herrera. The Class Representatives are also called the Plaintiffs. The companies that they sued (in this case MMD, Inc., Cantodiem Dispensing Collective, Inc., Compassionate Care Network, Inc., and NHS Collective) are called the Defendants. One court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

4. What has happened in the lawsuit?

On January 13, 2021, Plaintiffs filed a potential class action, or complaint, against Defendant MMD, Inc. in the Superior Court for the County of Los Angeles, alleging, among other things, failure to pay all wages, failure to provide meal periods, failure to authorize and permit rest periods, failure to timely pay wages due at termination, failure to reimburse necessary business expenses, failure to provide accurate itemized wages statements, and violations of the Unfair Competition Law.

On June 11, 2021, Plaintiffs filed a First Amended Complaint, asserting the same claims as the above complaint, and also seeking penalties pursuant to the Private Attorneys’ General Act, Labor Code section 2698 *et seq.* premised on those claims.

In March 29, 2013, Plaintiffs filed a Second Amended Complaint, asserting the same claims and seeking the same penalties as the First Amended Complaint, and additionally naming Defendants Cantodiem Dispensing Collective, Inc., Compassionate Care Network, Inc., and NHS Collective, and asserting the same claims as the previously filed complaint, and also asserting the Defendants are alter egos of the owners, joint employers, and form a single business enterprise.

You can read Plaintiff’s Second Amended Complaint (“Complaint”) at [\[REDACTED\]](#).

On December 13, 2023, the Court certified the following Class and Subclasses:

Class: All current and former non-exempt, hourly employees of Defendants in California at any time from January 13, 2018 through November 29, 2023.

Minimum Wage Subclass: All Class Members who were not paid at least minimum wage for all hours worked.

City of Los Angeles Minimum Wage Subclass: All Class Members who performed at least two (2) hours of work for Defendants in the City of Los Angeles and were not paid at least the City of Los Angeles minimum wage for all hours worked.

Meal Period Subclass: All Class Members who worked more than five (5) hours in a workday, and were not provided with a lawful, timely uninterrupted thirty (30) minute meal period or compensation in lieu thereof.

Rest Period Subclass: All Class Members who worked more than three and one-half (3 ½) hours in a workday and were not authorized or permitted to take one net ten (10) minute rest period for every four hours worked or major fraction thereof, or compensation in lieu thereof.

Wage Statement Subclass: All Class Members employed from January 13, 2020 to the present who received a wage statement and were not paid all wages owed.

Final Pay Subclass: All former Class Members employed from January 13, 2018 to the present who were not timely paid all wages at separation of employment.

Reimbursement Subclass: All Class Members who used a personal cell phone to perform their job duties and were not reimbursed.

Unfair Competition Subclass: All Class Members who (1) were subject to unlawful, illegal, unfair or deceptive business acts or practices by Defendants and, (2) are entitled to restitution for unpaid wages, unpaid meal or rest premiums or unreimbursed expenses from Defendants.

You can read the Court's Order Certifying the Class at [REDACTED].

Certifying the class does not mean that the Court has found the claims to be true. It just means that the Court has decided that the evidence supports the handling of the claims on a class-wide basis.

5. What are the Class Representatives asking for?

The Class Representatives are asking for, among other things, unpaid wages, liquidated damages, civil penalties pursuant to California Labor Code §§ 226(e)(1) and 226.3 for the alleged failure to provide itemized wages, waiting time pay pursuant to California Labor Code § 203 for the alleged failure to pay all wages owed at the time of termination or within 72 hours of resignation, civil penalties under Labor Code § 2698 et seq., interest, attorneys' fees and costs. More information about what Plaintiffs are seeking is available in the Complaint, which you can read at [REDACTED].

6. Is there any money available now?

No money or benefits are available now because the Court has not yet decided whether the Defendant did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will be obtained. If they are, you will receive a notice describing how to receive a share.

Who Is In The Class?

7. How do I know if I am a Class Member?

If you are a current or former non-exempt, hourly employee of Defendants who worked for Defendants in California at any time from January 13, 2017 through November 29, 2023, you may be a Class Member and a member of one or more of the Subclasses.

8. Are you still not sure if you're included?

If you still are not sure whether you are included in the Class, you can get free help by contacting [REDACTED], the Administrator, at the designated phone number for this matter which is ([REDACTED]) [REDACTED] - [REDACTED], or by calling or writing the lawyers representing the Class in this case ("Class Counsel"), at the phone number or address listed in Question 20, below.

9. Who are the Class Representatives?

Plaintiffs Deshone Busby and Stephanie Herrera will represent the Class. They are former non-exempt, hourly employees of Defendants in California.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or ask to be excluded by no later than [REDACTED].

10. What are my options as a Class Member?

You have two options. You may either remain in the Class and your rights and any recovery you may be entitled to will be determined in this case or you may request to be excluded (“opt-out”) from the Class and retain any rights you may have against Defendants.

11. What happens if I choose to stay in the Class?

If you stay in the Class, you will be permitted to share in a recovery, if any, that may occur in this Action. However, if you remain in the Class, you will give up any rights to sue the Defendants separately about the certified claims in this lawsuit. You also will be legally bound by all of the orders the Court issues and any judgment the Court makes in this class action, even if there is no recovery.

12. How do I stay in the Class?

To remain in the Class, you do not need to do anything. You will become a Class Member automatically.

13. What happens if I opt out of the Class?

If you opt out of the Class (by submitting the enclosed Request for Exclusion Form), you will give up the right to participate in any recovery that may occur. But you will keep any rights you may currently have to sue the Defendants regarding the legal claims at issue in this lawsuit and may hire a separate lawyer to do so. You also will not be bound by the orders the Court issues or any judgment the Court makes in this class action.

14. How do I opt out of the Class?

If you **do not** want to remain a member of the Class, **you must** complete, sign, and return the enclosed “Request For Exclusion Form” to the Notice Administrator postmarked, faxed or e-mailed no later than [REDACTED].

Your Request for Exclusion Form must be sent to the following address or fax number:

Deshone Busby v. MMD, Inc. Class Action
Settlement Administrator
c/o [REDACTED]
P. O. Box [REDACTED]
[REDACTED], CA [REDACTED]
Fax: (800) [REDACTED] - [REDACTED]
Email: [REDACTED]

If your request is not postmarked, faxed or e-mailed by the due date, it will not be valid and you will remain in the Class.

If you are considering excluding yourself from the Class, please note that there may be a risk that any new claims asserted against Defendants may no longer be timely and may be time barred.

15. What are the risks if I remain in the Class?

If you stay in the Class, you will be bound by the decisions of the Court. This means you will not be able to pursue any claim against Defendants on your own for matters that the Court has certified. If the Plaintiffs lose, you will not get any recovery and will not be able to bring a later claim for the matters that the Court has certified.

16. What are the benefits if I remain in the Class?

If you stay in the Class, you do not have to sue Defendants on your own for any claim you may have against Defendants related to the matters that the Court has certified. If there is a recovery, either by trial or by settlement, you may be entitled to a share of any recovery.

17. What happens if I do not do anything?

By doing nothing, you are choosing to stay in the Class. You don't have to do anything now if you want to stay in the Class. If you stay in the Class and the Plaintiffs obtain money or benefits, either as a result of a trial or a settlement, you will be notified about how to receive a share (or how to ask to be excluded from any settlement). Regardless of whether the Plaintiffs win or lose the trial, you will not be able to sue, or continue to sue Defendants—as part of any other lawsuit—about the same matters that the Court has certified. You will also be legally bound by all of the orders the Court issues and any judgment the Court makes in this class action.

18. Do I have to come to the trial?

No. You do not have to come to trial unless you receive a subpoena to appear at trial by one of the parties. If you remain in the Class, Class Counsel and the Plaintiffs will represent you. You are welcome to come at your own expense.

19. Has a trial date been set?

No trial date has been set in this case.

THE LAWYERS REPRESENTING YOU

20. As a Class Member, do I have a lawyer representing my interests in this Class Action?

Yes. The Court has appointed lawyers to represent you and the other Class Members. These lawyers are called Class Counsel. Class Counsel are experienced in handling similar cases against other employers. The following lawyers are representing the Class:

FARNAES & LUCIO, APC
2235 Encinitas Boulevard., Suite 210
Encinitas, California 92024
(760) 942-9433 (Phone)
Malte L. L. Farnaes, Esq. (malte@farnaeslaw.com)
Christina M. Lucio, Esq. (clucio@farnaeslaw.com)
Mitchell J. Murray, Esq. (mitch@farnaeslaw.com)

21. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you may have to pay that lawyer. If you hire a lawyer to speak for you or to appear in Court, your lawyer must file a Notice of Appearance.

22. How will the lawyers be paid, and will the Class Representatives be paid?

You do not owe the Class Representatives or Class Counsel any money unless a recovery is obtained. If recovery is obtained for the Class, Class Counsel will request from the Court an award for attorneys' fees and expenses. Class Counsel may also ask the Court to approve reasonable incentive awards for the Class Representatives. If approved, these fees and expenses and the incentive awards will be paid from the recovery obtained for the Class.

GETTING MORE INFORMATION

23. Where do I get more information

You may contact Class Counsel at any time at the address, phone number, or email addresses in Question 20 for additional information.

This Notice contains a summary of relevant court papers. Complete copies of public pleadings, Court rulings and other filings are available for review and copying at the Clerk's office. The address for the Spring Street Courthouse is 312 N. Spring St., Los Angeles, CA 90012, (213) 310-7000. Information is also available at _____, or by calling the Notice Administrator at (_____) _____ - _____, or by writing to: Deshone Busby v. MMD, Inc. Class Action, c/o _____, P.O. Box _____, _____, CA _____.

Please do not contact the Court or Judge Rice. They cannot answer any questions or discuss the Action.

DATED: _____

BY ORDER OF THE SUPERIOR COURT OF CALIFORNIA,
COUNTY OF LOS ANGELES

Exhibit 2

Superior Court of the State of California for the County of Los Angeles
Busby v. MMD, Inc.
Case No. 21STCV01413

REQUEST FOR EXCLUSION FORM

You should **only** complete this form if you want to be excluded (opt out) from the Class that has been certified in this case. Before completing this form, you should read the Court-issued Notice of Class Certification. You should **not** complete this form if you want to remain a member of the class.

If you want to be excluded from this class action, you must complete and sign this form and send it by mail, e-mail, or fax to:

Busby v. MMD, Inc. Class Action
Settlement Administrator
c/o _____
P. O. Box _____
_____, CA _____
Fax: (800) _____ - _____
E-mail: _____

I certify that I have read the Court-issued Notice of Class Certification and I do **not** want to remain a member of the Class in *Deshone Busby, et al. v. MMD, Inc., et al.*, Case No. 21STCV01413 currently pending in the Superior Court of the State of California for the County of Los Angeles. I understand that, by completing this form, I will **not** share in any judgment or settlement that may be obtained for the Class, but I will keep any rights that I may currently have against Defendants regarding the legal claims at issue in the case. I understand that there may be a risk that any new claims asserted against Defendants may no longer be timely and may be time barred.

Name: _____
First Middle Last

Last 4 Digits of Social Security Number or Full Employee ID Number _____

Mailing Address: _____
Street Address

City State Zip

Telephone Number: (____) _____ - _____

Dated: _____, _____
Signature

Exhibit 3

Superior Court of the State of California, County of Los Angeles
Deshone Busby, et al. v. MMD, Inc., et al.
Case No. 21STCV01413

CHANGE OF ADDRESS FORM

I wish to change my name and/or mailing address and/or other contact information to the following:

Name:

First Middle Last

Former Name:

First Middle Last

Mailing Address:

Street Address

City State Zip

Telephone Number: (____) _____ - _____

Email: _____

I understand all future correspondence in this Lawsuit, including important notices, will be sent to the address shown above and not to the address previously used. I hereby request and consent to the use of the address listed above for these purposes.

Dated: _____

Signature

PLEASE RETURN THIS FORM BY MAIL OR FAX TO:

Deshone Busby v. MMD, Inc. Class Action
Settlement Administrator

c/o _____

P. O. Box _____

_____, _____

Fax: 800-_____