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7 Attorneys for Plaintiff SOFIA LEDESMA,
on behalf of herself and all others similarly situated
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF ORANGE, CIVIL COMPLEX CENTER**

12 SOFIA LEDESMA, on behalf of herself
13 and all others similarly situated,

14 Plaintiff,

15 v.

16 SHRIN, LLC, a Delaware Limited Liability
17 Company; SHRIN CORPORATION, a
18 California Corporation, COVERKING,
unknown entity; and DOES 1-50, inclusive,

19 Defendants.
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Case No.: 30-2020-01145279-CU-OE-CXC

Assigned to: Hon. Randall J. Sherman
Dept.: CX-105

**STIPULATION APPROVING NOTICE TO
THE CERTIFIED CLASS AND APEX
CLASS ACTION AS NOTICE
ADMINISTRATOR; [~~PROPOSED~~] ORDER**

Complaint Filed: June 26, 2020
Trial Date: None Set

1 The Parties to the above-entitled action, through their respective counsel of record,
2 submit this Stipulation and Proposed Order requesting approval of the attached notice to the
3 Class certified on August 9, 2024, giving them notice of the action and the option of opting out
4 of the certified class. The Parties stipulate and agree as follows:

- 5 1. The proposed Notice is attached hereto as **Exhibit 1**. The proposed Request for
6 Exclusion form and Change of Address forms are attached hereto as **Exhibits 2 and 3**,
7 respectively. The Parties request the Court’s approval of the Notice, the Request for
8 Exclusion, and Change of Address Forms in connection with this Stipulation. Exhibits 1-
9 3 are collectively referred to as the “Notice Packet” or “Notice” herein.
- 10 2. If approved, the Notice will be translated into Spanish prior to mailing. The Notice
11 Packet in both English and Spanish will be mailed out to members of the Certified Class
12 at their last known address via First Class U.S. Mail as set forth herein.
- 13 3. Within three (3) days of the Court’s entry of an order approving this Stipulation and the
14 proposed Notice, Defendant will send a list of all members of the Certified Class to the
15 Notice Administrator, including the individual’s full name, last known address,
16 telephone number, last known email address, and social security number.
- 17 4. Within five (5) business days of receipt of the list of all members of the Certified Class,
18 the administrator shall mail the Notice Packet to members of the Certified Class at their
19 last known address. Before mailing, the administrator shall conduct a National Change
20 of Address database search to update the addresses as accurately as possible.
- 21 5. Any Notices returned to the Administrator before the response deadline set forth in the
22 Notice will promptly be re-mailed by First Class U.S. mail to the forwarding address, if
23 provided, and the Administrator will indicate the date of re-mailing on the Notice. If no
24 forwarding address is provided, the Administrator will promptly attempt to determine
25 the correct address using a skip-trace or other search using the name, address, and/or
26 social security number of the Class or Subclass Member and will re-mail the Notice to
27 the updated address one additional time.
- 28 6. Class Members who receive a re-mailed Notice will have the later of: (1) an additional

1 fifteen (15) calendar days, or (ii) the response deadline (as set forth in the Notice) to
2 postmark or fax a Request for Exclusion Form.

3 7. Class Members may request exclusion from the class action by completing and
4 submitting a completed Request for Exclusion form to the Administrator within forty-
5 five (45) days of the initial mailing (or in the case of re-mailing within sixty (60) days of
6 the initial mailing).

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

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

18 10. Within four (4) business days of the deadline for Class Members to request exclusion
19 from the Class, the Administrator shall provide such Class Members' contact
20 information (including name, last known address, telephone number, and any known
21 personal e-mail address) to Plaintiffs' counsel.

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

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

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Dated: September 25, 2024

JAMES HAWKINS APLC

By: /s/Christina M. Lucio
James R. Hawkins
Christina M. Lucio
Mitchell J. Murray

Attorneys for Plaintiff and the certified
Class and Subclasses

Dated: September 25, 2024

JACOBS & DODDS

By: /s/ Paul Jacobs
Paul Jacobs

Attorney for Defendant

1 **[PROPOSED] ORDER**

2 Before the Court is a Stipulation approving the notice of class certification to be sent to
3 the certified class, and appointing Apex Class Action as notice administrator (the “Stipulation”),
4 jointly submitted by Plaintiff Sofia Ledesma (“Plaintiff”) and Defendant Shrin, LLC (Formerly
5 Shrin Corporation) (“Defendant”)(collectively, the “Parties”). Having reviewed the Stipulation,
6 and good cause appearing therefor, the Court hereby APPROVES the Stipulation and ORDERS
7 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 Plaintiff’s Motion for Class Certification issued on August 9, 2024.

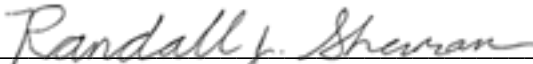
11 2. Apex Class Action is approved to administer the Class Notice to the
12 Class Members.

13 3. The Class Notice shall be distributed to the Class Members by **U.S. mail**.

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

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19 IT IS SO ORDERED.

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21 DATED: **September 26, 2024**


22 Hon. Randall J. Sherman
23 Judge of the Superior Court
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PROOF OF SERVICE, COUNTY OF ORANGE

I am a resident of the State of California, County of Orange. I am over the age of eighteen years and not a party to the within action. My business address is 9880 Research Drive., Suite 200, Irvine, California 92618.

On September 26, 2024, I served on the interested parties in this action the following document(s) entitled:

-STIPULATION APPROVING NOTICE TO THE CERTIFIED CLASS AND APEX CLASS ACTION AS NOTICE ADMINSTRATOR; [PROPOSED] ORDER

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address irma@jameshawkinsapl.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

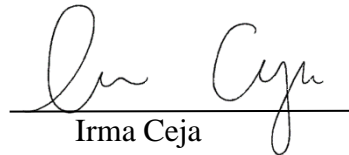
SERVICE LIST

Paul N. Jacobs, Esq.
Debra A. Dodds, Esq.
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Attorneys for Defendant
Shrin, LLC

[X] STATE: I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on September 26, 2024, at Irvine, California.


Irma Ceja