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6 Attorneys for Defendant Golden State Drilling, Inc.  
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF KERN**

10  
11 LONDON FULMER, JR; individually, and on  
behalf of other members of the general public  
12 similarly situated, and on behalf of aggrieved  
employees pursuant to the Private Attorneys  
13 General Act ("PAGA");

14 Plaintiff,

15 vs.

16 GOLDEN STATE DRILLING, INC., a California  
Corporation and Does 1 through 100, inclusive,

17 Defendants.  
18  
19

Case No. **S-1500-CV-279707 SDS (LEAD)**  
**(C/W S-1500-CV-281000; S-1500-CV-281013;**  
**BCV-16-100108)**

Assigned for All Purposes:  
Hon. Stephen D. Shuett, Dept. 10

**STIPULATION TO AMEND JUDGMENT  
TO MODIFY CLASS ACTION  
SETTLEMENT PAYMENT SCHEDULE**

Date: XXXXXXXX  
Time: XXXXXXXX  
Place: Dept. 10  
1415 Truxtun Ave.  
Bakersfield, CA 93301

20 AND ALL CONSOLIDATED MATTERS.  
21  
22  
23

1 Plaintiffs Landon Fulmer, Jr. and Michael Oleson (“Plaintiffs”), individually and on behalf of  
2 all other class members and aggrieved employees, and Defendant Golden State Drilling, Inc.  
3 (“Defendant”), by and through their respective attorneys of record, hereby stipulate as follows:

4 WHEREAS, on May 4, 2018, the Parties reached a classwide settlement;

5 WHEREAS, on January 10, 2019, the Court issue an Order and Final Judgment Granting  
6 Motion for Final Approval of Class Action Settlement, which authorized the “Eligible Class Members  
7 . . . upon approval of the Court, to agree to an adopt amendments to or modifications of the Settlement  
8 Agreement, by a written instrument signed by counsel for all Parties or their successors.”;

9 WHEREAS, from August 27, 2020 to December 7, 2020, the Parties have met and conferred  
10 about modifying the payment schedule called for by the Settlement Agreement’s Implementation  
11 Schedule given the detrimental economic effect caused by COVID-19 pandemic, attached hereto as  
12 Exhibit “A”;

13 WHEREAS, on December 7, 2020, the parties agreed to an amended payment schedule and to  
14 bring this modification to the Court for approval.

15 THEREFORE, the parties agree and stipulate as follows:

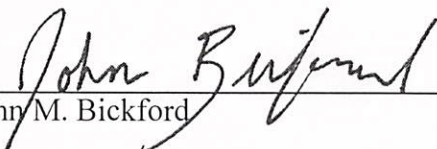
- 16 1. Implementation Schedule of the Class Action Settlement is amended by changing the  
17 timing of the payments Golden State Drilling is to make as follows:
  - 18 a. Golden State Drilling to make a one-time payment to the third party administrator  
19 of \$500,000 on January 1, 2021; and
  - 20 b. On April 1, 2021, and every three months thereafter until the total amount is paid,  
21 Golden State Drilling will either pay:
    - 22 i. \$250,000, or
    - 23 ii. \$500,000 only if a total of at least five (5) or more oil drilling rigs have  
24 operated continuously for the previous six months prior to the date of  
25 payment being made;
- 26 2. Pursuant to the amended Settlement Agreement, Golden State Drilling will submit a  
27 signed declaration to the third party administrator, as well as all counsel, by email every  
28 three months, detailing the rigs that were operational over the course of the prior six  
months;

- 1 3. Golden State Drilling agrees to pay for the additional costs of administrating this  
2 amended payment schedule;
- 3 4. If economic conditions change, Golden State Drilling will make its best efforts to  
4 accelerate the payment schedule agreed to above by paying more than is required under  
5 the payment terms as it is able to do so, in order for the judgment to be fully satisfied  
6 and the payments to be fully paid by the third party administrator sooner;
- 7 5. As a result of this amended implementation schedule, the total amount of the judgment  
8 does not change, only the timing of the payments being made to the third party  
9 administrator, and the third party administrator will make distributions once sufficient  
10 funds are received to make the second and third distributions as originally  
11 contemplated.

12 **IT IS SO STIPULATED.**

13  
14 Dated: January 6, 2021

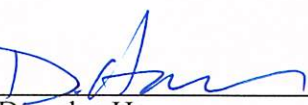
PARRIS LAW CORPORATION  
R. Rex Parris  
Kitty K. Szeto  
John M. Bickford  
Eric N. Wilson

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17  
18 By:   
19 John M. Bickford

20 Attorneys for Plaintiff Landon Fulmer, Jr., Putative  
21 Subclass No. 1, and the Aggrieved Employees

22  
23 Dated: January 6, 2021

JUSTICE LAW CORPORATION

24  
25 By:   
26 Douglas Han

27 Attorneys for Plaintiff Michael Oleson, Putative Subclass  
28 No. 2, and the Aggrieved Employees

1 Dated: January 6, 2021

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A Professional Corporation  
John T. Egley  
Joshua G. Simon

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5 By: \_\_\_\_\_  
John T. Egley  
Attorneys for Defendant Golden State Drilling, Inc

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