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1 WILLIAM L. MARDER, ESQ. (CBN 170131)
2 **Polaris Law Group LLP**
3 501 San Benito Street, Suite 200
4 Hollister, CA 95023
5 Tel: (831) 531-4214
6 Fax: (831) 634-0333

7 Dennis S. Hyun (State Bar No. 224240)
8 **HYUN LEGAL, APC**
9 515 S. Figueroa St., Suite 1250
10 Los Angeles, CA 90071
11 (213) 488-6555
12 (213) 488-6554 facsimile

13 Attorneys for Plaintiff and the Proposed Class

14 Jessica R. Perry (SBN 209321)
15 jperry@orrick.com
16 Allison Riechert Giese (SBN 267533)
17 agiese@orrick.com
18 **ORRICK, HERRINGTON & SUTCLIFFE LLP**
19 1000 Marsh Road
20 Menlo Park, California 94025-1015
21 Tel: (650) 614-7400
22 Fax: (650) 614-7401

23 Attorneys for Defendant
24 **WILLIAMS-SONOMA STORES, INC.**

25 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
26 **FOR THE COUNTY OF PLACER**

27 BARBARA FARINHA, as an individual
28 and on behalf of all others similarly
situated,

Plaintiffs,

vs.

WILLIAMS-SONOMA STORES, INC.,
a California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: S-CV-0042819

**STIPULATION AND ~~PROPOSED~~ ORDER
TO AMEND STIPULATION OF
SETTLEMENT AND RELEASE**

FILED
Superior Court of California
County of Placer

AUG 04 2020

Jake Chatters
Executive Officer & Clerk
By: O. Lucatuorto, Deputy

1 STIPULATION

2 Plaintiff Barbara Farinha and Defendant Williams-Sonoma Stores, Inc. (collectively, the
3 "Parties"), by and through their counsel of record, hereby stipulate as follows with reference to
4 the following facts:

5 1. WHEREAS, on July 6, 2020, this Court granted Plaintiff's Motion for
6 Preliminary Approval of Class Action Settlement;

7 2. WHEREAS, section 4(b)(iii) of the Stipulation of Settlement and Release states as
8 follows:

9 Wage Statement Amount: Five percent (5%) of the Net Settlement
10 Amount shall be designated as the "Wage Statement Amount." The
11 Wage Statement Amount shall be distributed to each participating
12 Settlement Class Member based on the proportional number of pay
13 periods worked during the "Wage Statement Period," which is
14 April 12, 2017 through the date of preliminary approval, or
15 January 31, 2020, whichever is earlier.

16 3. The Parties wish to amend the Wage Statement Period to April 12, 2018 through
17 the date of preliminary approval, or January 31, 2020, whichever is earlier, which is the correct
18 statute of limitations for claims for wage statement violations.

19 NOW, THEREFORE, the Parties hereby stipulate that section 4(b)(iii) of the Agreement
20 is amended as follows:

21 Wage Statement Amount: Five percent (5%) of the Net Settlement
22 Amount shall be designated as the "Wage Statement Amount." The
23 Wage Statement Amount shall be distributed to each participating
24 Settlement Class Member based on the proportional number of pay
25 periods worked during the "Wage Statement Period," which is
26 April 12, 2018 through the date of preliminary approval, or
27 January 31, 2020, whichever is earlier.

28 IT IS SO STIPULATED.

DATED: August 3, 2020

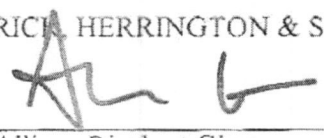
POLARIS LAW GROUP, LLP

By: William L. Marder
William L. Marder
Attorneys for Plaintiff and the Class

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DATED: August 3, 2020

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: 

Allison Riechert Giese
Attorneys for Defendant

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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING THEREFORE, the Parties' Stipulation is hereby approved. ACCORDINGLY, IT IS HEREBY ORDERED section 4(b)(iii) of the Settlement Agreement is amended as follows:

Wage Statement Amount: Five percent (5%) of the Net Settlement Amount shall be designated as the "Wage Statement Amount." The Wage Statement Amount shall be distributed to each participating Settlement Class Member based on the proportional number of pay periods worked during the "Wage Statement Period," which is April 12, 2018 through the date of preliminary approval, or January 31, 2020, whichever is earlier.

IT IS SO ORDERED.

DATED: 8/4/20, 2020



Judge of the Superior Court
Hon. Charles D. Wachob
Judge of the Superior Court