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9 Attorneys for Plaintiffs

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13 SUPERIOR COURT OF CALIFORNIA
14 COUNTY OF SAN FRANCISCO

15
16 TANIKA TURLEY and CHRISTOPHER
17 THOMPSON, individually and on behalf
of all others similarly situated,

18 Plaintiffs,

19 v.

20 CHIPOTLE SERVICES, LLC, and DOE
21 ONE through and including DOE ONE-
HUNDED,

22 Defendants.

Case No. CGC-15-544936

ASSIGNED FOR ALL PURPOSES TO
HON. ANNE-CHRISTINE MASSULLO
DEPARTMENT 304

STIPULATED ADDENDUM TO THE
STIPULATION OF CLASS ACTION
SETTLEMENT

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Attorneys for Defendant
CHIPOTLE SERVICES, LLC

1 STIPULATED ADDENDUM TO STIPULATION OF CLASS ACTION SETTLEMENT

2 This Stipulated Addendum (“Addendum”) to the Stipulation of Class Action Settlement (the
3 “Settlement”) is made and entered into by and between Plaintiff TANIKA TURLEY, individually
4 and on behalf of the class (“Plaintiff”), and Defendant CHIPOTLE SERVICES, LLC (herein
5 “CHIPOTLE” or “Defendant”). Plaintiffs and Defendant are collectively referred to in this
6 Settlement as the “Parties.”

7 WHEREAS, the Settlement was fully executed on September 4, 2020.

8 WHEREAS, the Parties submitted the Settlement for preliminary approval at a hearing
9 which was held on September 23, 2020 (the “Approval Hearing”).

10 WHEREAS, at the Approval Hearing, the Court requested certain administrative changes to
11 be made to the Class Notice and Settlement.

12 WHEREAS, paragraph 72 of the Settlement allows the Parties to amend the Settlement to
13 address administrative issues, as directed by the Court, through Stipulation signed by counsel for all
14 Parties.

15 WHEREAS, this Addendum incorporates by reference all terms and conditions of the
16 Settlement. But for those specific terms and condition that this Addendum modifies, all terms and
17 conditions in the Settlement will remain effective and enforceable. Any inconsistencies between this
18 Addendum and Settlement will be interpreted and construed in favor of this Addendum.

19 THEREFORE, IT IS HEREBY STIPULATED by the Parties, by and through their
20 counsel of record herein, subject to Court approval, that the Settlement is modified as follows:

21 Revisions to Paragraph VII(D)(44)

22 No changes will be made to the text of paragraph VII(D)(44) EXCEPT that the following
23 sentence shall be added to the end of paragraph VII(D)(44):

24 In the alternative, a Class Member may request exclusion by submitting a letter
25 to the Settlement Administrator which includes his/her name (and former
26 names, if any), current address, telephone number and a signed statement in
27 substantially the same form as follows: “Please exclude me from the proposed
28 Settlement Class in *Turley v. Chipotle*, Case No. CGC-15-544936.”

1 Revisions to Paragraph V(D)(27)

2 Paragraph VII(D)(44) shall be revised as follows to add the additional underlined text:

3 Class Members who do not affirmatively opt-out of the settlement will receive
4 a pro-rata share of the Wage Statement Settlement Amount based on pay
5 periods worked during the period from October 1, 2014 to December 31, 2015
6 (the "Calculation Period"). After a Second Distribution, if any, all checks not
7 cashed within 180 days of payment shall be paid to Public Counsel, the *cy pres*
8 of Defendant's selection, in accordance with Code of Civil Procedure section
9 384.

10 Revisions to Class Notice


11 The redlined Class Notice, revised pursuant to the Court's tentative ruling, is attached hereto,
12 at Exhibit A. A clean, unmarked copy of the revised Class Notice is attached hereto as Exhibit B.

13
14 IT IS SO STIPULATED

15 Dated: _____, 2020

16 _____
17 ALAN HARRIS
18 PRIYA MOHAN
19 DAVID GARRETT
20 HARRIS & RUBLE
21 Attorneys for Plaintiff and Settlement Class

22 Dated: September 30, 2020

23 _____
24 
25 ANGELA AGRUSA
26 LEVI W. HEATH
27 STEVE L. HERNÁNDEZ
28 DLA PIPER LLP (US)
Attorneys for Defendant

29 Dated: _____, 2020

30 _____
31 DAVID HARRIS
32 NORTH BAY LAW GROUPD
33 Attorneys for Plaintiff and Settlement Class

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Revisions to Paragraph V(D)(27)

Paragraph VII(D)(44) shall be revised as follows to add the additional underlined text:

Class Members who do not affirmatively opt-out of the settlement will receive a pro-rata share of the Wage Statement Settlement Amount based on pay periods worked during the period from October 1, 2014 to December 31, 2015 (the "Calculation Period"). After a Second Distribution, if any, all checks not cashed within 180 days of payment shall be paid to Public Counsel, the *cy pres* of Defendant's selection, in accordance with Code of Civil Procedure section 384.

Revisions to Class Notice

The redlined Class Notice, revised pursuant to the Court's tentative ruling, is attached hereto, at Exhibit A. A clean, unmarked copy of the revised Class Notice is attached hereto as Exhibit B.

IT IS SO STIPULATED

Dated: 9/30/2020, 2020

DocuSigned by:
David garrett
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ALAN HARRIS
PRIYA MOHAN
DAVID GARRETT
HARRIS & RUBLE
Attorneys for Plaintiff and Settlement Class

Dated: _____, 2020

ANGELA AGRUSA
LEVI W. HEATH
STEVE L. HERNÁNDEZ
DLA PIPER LLP (US)
Attorneys for Defendant

Dated: 9/30/2020, 2020

DocuSigned by:
David Harris
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DAVID HARRIS
NORTH BAY LAW GROUPD
Attorneys for Plaintiff and Settlement Class