

**AEGIS LAW FIRM, PC**

KASHIF HAQUE, State Bar No. 218672  
SAMUEL A. WONG, State Bar No. 217104  
JESSICA L. CAMPBELL, State Bar No. 280626  
9811 Irvine Center Drive, Suite 100  
Irvine, California 92618  
Telephone: (949) 379-6250  
Facsimile: (949) 379-6251

Attorneys for Plaintiff Nathan Allen Joseph Love  
and Successors in Interest Sarah Medina and Kayla Tristan

**ARENTFOX SCHIFF, LLP**

MORGAN P. FORSEY, State Bar No. 241207  
BRETT D. YOUNG, State Bar No. 305657  
555 West 5<sup>th</sup> Street, 48<sup>th</sup> Floor  
Los Angeles, CA 90013  
Telephone: 213.629.7400  
Facsimile: 213.629.7401

Attorneys for Defendant  
EXPRESS SERVICES, INC.

[Additional counsel listed on the next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF KERN

NATHAN ALLEN JOSEPH LOVE,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

vs.

MODERN WELDING COMPANY OF  
CALIFORNIA, INC.; EXPRESS  
SERVICES, INC.; and DOES 1 through  
20, inclusive,

Defendants.

Case No. BCV-22-101097

*Assigned for all purposes to:  
Judge Gregory A. Pulskamp  
Division J*

**ADDENDUM TO JOINT STIPULATION OF  
SETTLEMENT AND CLASS NOTICE**

**BAKER MANOCK & JENSEN, PC**  
DIANE E. CODERNIZ, State Bar No.279458  
5620 North Palm Avenue, Suite 201  
Fresno, CA 93704  
Telephone: (559) 432-5400  
Facsimile: (559) 432-5620

Attorneys for Defendant  
MODERN WELDING COMPANY OF CALIFORNIA, INC.

**ADDENDUM TO SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED, by and between Plaintiff NATHAN ALLEN JOSEPH LOVE's ("Named Plaintiff") successors in interest, Sarah Medina and Kayla Tristen ("Named Plaintiff's Successors"), on behalf of themselves and the Class and PAGA Group Members, on the one hand, and Defendants Modern Welding Company of California, Inc. and Express Services, Inc. ("Defendants") (collectively with Named Plaintiff's Successors, the "Parties"), on the other hand, and subject to the approval of the Court, through the Parties and their respective counsel of record, hereby agree to be bound by the terms set forth in this Addendum to the Joint Stipulation of Settlement ("Agreement" or "Settlement") and Class Notice, which is intended to replace and supersede **Article I(g) and Article I(bb)**, as set forth below. Terms used herein shall have the same meaning as in the Settlement Agreement and Notice unless defined differently in this Addendum. This Addendum is being made in accordance with Article IV, Section 6.01 of the Agreement.

The Settlement Agreement shall be modified as follows:

Article I

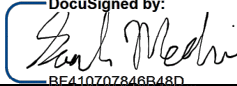
g. "Class Period" means November 7, 2017 through May 1, 2024.

bb. "PAGA Group Members" means all Class Members employed by Defendants at any time between November 7, 2020 through May 1, 2024 ("PAGA Period").

All other references to "Class Period" or "PAGA Group Members" or "PAGA Period" in the Settlement Agreement shall reflect the modified language of Article I(g) and Article I(bb).

Dated: 10/29/2024

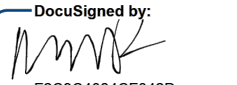
SARAH MEDINA

DocuSigned by:  
  
BE410707846B48D...

Successor in interest for Nathan Love

Dated: 10/29/2024

KAYLA TRISTAN

DocuSigned by:  
  
F2C9C4084CF042D...

Successor in interest for Nathan Love


1 Dated: \_\_\_\_\_ MODERN WELDING COMPANY OF  
2 CALIFORNIA, INC.

3  
4 By: \_\_\_\_\_

5 10/29/2024  
6 Dated: \_\_\_\_\_ EXPRESS SERVICES, INC.

7 Signed by:  
8   
9 1239141F94F8473...  
10 By: Sarah Keates


11 AS TO FORM ONLY:  
12 Dated: 10/29/2024 AEGIS LAW FIRM, PC

13   
14 Samuel A. Wong  
15 Jessica L. Campbell  
16 Lisa B. Iturriaga  
17 Attorneys for Plaintiff

18  
19 Dated: \_\_\_\_\_ BAKER MANOCK & JENSEN, PC

20 Diane Coderniz  
21 Attorneys for Defendant  
22 Modern Welding Company of California,  
23 Inc.

24 Dated: October 29, 2024 ARENTOX SCHIFF LLP

25   
26 Morgan P. Forsey  
27 Attorneys for Defendant  
28 Express Services, Inc.

1 Dated: 10/29/2024

MODERN WELDING COMPANY OF  
CALIFORNIA, INC.

Signed by:



By: James M. Ruth, President

2  
3  
4  
5 Dated: \_\_\_\_\_

EXPRESS SERVICES, INC.

6  
7 By: \_\_\_\_\_

8  
9 AS TO FORM ONLY:

10  
11 Dated: \_\_\_\_\_

AEGIS LAW FIRM, PC

12  
13 \_\_\_\_\_  
Samuel A. Wong  
Jessica L. Campbell  
Lisa B. Iturriaga  
Attorneys for Plaintiff

14  
15  
16 Dated: October 29, 2024

BAKER MANOCK & JENSEN, PC



17  
18 \_\_\_\_\_  
Diane Coderniz  
Attorneys for Defendant  
Modern Welding Company of California,  
Inc.

19  
20  
21 Dated: \_\_\_\_\_

ARENTFOX SCHIFF LLP

22  
23 \_\_\_\_\_  
Morgan P. Forsey  
Attorneys for Defendant  
Express Services, Inc.