

1 **BURSOR & FISHER, P.A.**
2 L. Timothy Fisher, Esq. (State Bar No. 191626)
3 1990 North California Blvd., Suite 940
4 Walnut Creek, CA 94596
5 Telephone: (925) 300-4455
6 Facsimile: (925) 407-2700
7 E-Mail: ltfisher@bursor.com

8 *Attorneys for Plaintiffs and the Putative Class*

9 *[Additional Counsel Listed on Signature Page]*

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 IMANI WHITFIELD and SHAWANNA
13 MCCOY, individually and on behalf of
14 all others similarly situated,

15 **Plaintiffs,**

16 vs.

17 YES TO, INC.,

18 **Defendant.**

Case No. 2:20-cv-00763-AB (ASx)

Consolidated with:
2:20-cv-01223-AB (ASx)

Assigned to Hon. Andre Birotte, Jr.

JOINT NOTICE OF SETTLEMENT

Action Filed: January 24, 2020

19 JOSEY PARSONS AUGHTMAN,
20 individually and on behalf of all others
21 similarly situated,

22 **Plaintiff,**

23 vs.

24 YES TO, INC., a Delaware corporation
25 and DOES 1 – 10, inclusive

26 **Defendant.**

1 Pursuant to Local Rule 16-15.7, Plaintiffs Imani Whitfield, Shawanna McCoy,
2 Josey Parsons Aughtman (“Plaintiffs”) and Defendant Yes To, Inc. (“Yes To” or
3 “Defendant”) (collectively, the “Parties”), by their undersigned counsel, hereby
4 submit this Joint Notice of Settlement. Following private mediation, the Parties have
5 reached an agreement in principle to settle the above-captioned matter in full and on a
6 class-wide basis. The parties are finalizing settlement documents, which will be
7 subject to Court-approval, and anticipate filing pertinent documents concerning the
8 same within 30 days.

9 Accordingly, the Parties respectfully request that the Court vacate all hearing
10 dates and deadlines currently scheduled in this matter.

11 Dated: December 14, 2020

BURSOR & FISHER, P.A.¹

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13 By: L. Timothy Fisher

L. Timothy Fisher, Esq. (State Bar No. 191626)
1990 North California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-Mail: ltfisher@bursor.com

18 **MILSTEIN JACKSON**
FAIRCHILD & WADE, LLP

Gillian L. Wade, Esq.
Sara D. Avila, Esq.
Marc A. Castaneda, Esq.

22 **GOLOMB & HONIK**
Kenneth Grunfeld (*pro hac vice*)

Attorneys for Plaintiffs and the Proposed Class

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28 ¹ Filer attests that all signatories listed herein concur in the filing’s content and have
authorized the filing pursuant to Local Rule 5-4.3.4(a)(2)(i).

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Dated: December 14, 2020

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

By: /s/ Jeffrey M. Goldman
Jeffrey M. Goldman, Esq.
Erica R Graves, Esq.

Attorneys for Defendant Yes To, Inc.