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Attorneys for Plaintiff Heath Seltzer and the Proposed Settlement Class

[Additional counsel appear on signature page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

HEATH SELTZER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GEOFFREY H. PALMER; GEOFFREY H.
PALMER dba G.H. PALMER
ASSOCIATES; GHP MANAGEMENT
CORPORATION, a California corporation;
and DOES 1-50, inclusive,

Defendants.

CASE NO.: 18STCV07828 (Lead)
Consolidated with No.: 20STCV22701

*Assigned for all purposes to
The Honorable Stuart M. Rice*

**AMENDMENT TO STIPULATION OF
SETTLEMENT**

Department: 1

Date Action Filed: December 10, 2018

1 This Amendment to Stipulation of Settlement (“Amendment”) is made November __, 2022,
2 between Plaintiff Heath Seltzer (“Plaintiff”), on the one hand, and Defendants Geoffrey H. Palmer,
3 Geoffrey H. Palmer dba G.H. Palmer Associates, and GHP Management Corporation (collectively,
4 “Defendants” and, together with Plaintiff, the “Parties”), on the other hand.

5 **RECITALS**

6 **WHEREAS**, on or about October 28, 2022, Plaintiff Heath Seltzer filed a Stipulation of
7 Settlement (“Settlement”) that, if approved, would resolve the above-entitled action on a class-wide
8 basis, along with a Revised, Unopposed Motion for Preliminary Approval of that Settlement;

9 **WHEREAS**, on November 22, 2022, the Court issued a tentative ruling that would approve
10 the Settlement, contingent on three items: (1) provision of a fully executed settlement agreement
11 including the signature of Co-Class-Counsel Zimmerman Reed LLP; (2) an extension of the response
12 deadline for objections in the event of a re-mailing; and (3) clarification of when payment of the
13 Second Distribution, as described in the Settlement, will be made;

14 **NOW, THEREFORE**, in order to resolve the Court’s remaining items, and in consideration
15 of the covenants and agreements set forth herein, the Parties agree as follows:

16 **AMENDMENT**

17 1. Paragraph 59 of the Settlement is modified to include, in addition to its current text:
18 “The Settlement Administrator shall complete distribution of Second Settlement Shares no later than
19 120 days following the Effective Date.”

20 2. Paragraph 61 of the Settlement is modified such that “140 days” is replaced with “190
21 days.”

22 3. Paragraph 65 of the Settlement is modified such that “August 5, 2022” is replaced with
23 “November 30, 2022.”

24 4. Capitalized terms in this Amendment have the meanings ascribed to them in the
25 Settlement, unless otherwise defined.

26 5. Except as specifically modified in this Amendment, the terms and conditions of the
27 Settlement shall remain unmodified and in full force and effect.

28 IN WITNESS HEREOF, the Parties have executed this Amendment effective as of the date

1 first set forth above.
2
3

4 **PLAINTIFF**

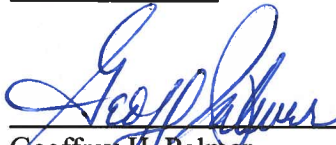
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6 Dated: 12/01/2022



Heath Seltzer

8
9 **DEFENDANTS**

10 Dated: 11.30.22



Geoffrey H. Palmer

12
13 Dated: 11.30.22



Geoffrey H. Palmer dba G.H. Palmer Associates

15
16 Dated: 11.30.22



GHP Management Corporation

18
19 By: Geoffrey H. Palmer
Its: President

20
21 **CLASS COUNSEL**

22
23 Dated: 12/01/2022



Theodore W. Maya
AHDOOT & WOLFSON, PC
Attorneys for Plaintiff and the Class

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26
27 Dated: 12/01/2022

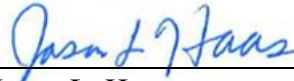


Caleb Marker
ZIMMERMAN REED LLP
Attorneys for Plaintiff and the Class

DEFENSE COUNSEL

Dated: November 30, 2022

ERVIN COHEN & JESSUP, LLP



Jason L. Haas
For Defendants GHP Management
Corporation Geoffrey H. Palmer, and
Geoffrey H. Palmer dba G.H. Palmer
Associates