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7 Attorneys for Plaintiff
8 Michael DiPirro

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ALAMEDA
12 UNLIMITED CIVIL JURISDICTION
13

14 MICHAEL DIPIRRO,
15 Plaintiff,

16 v.

17
18 BEE SALES COMPANY; and DOES 1-150,
19 Defendants.

Case No. 22-CV-013574

**AMENDMENT TO CONSENT
JUDGMENT**

(Health & Safety Code § 25249.6 *et seq.*)

1 For due consideration, and after consultation with the California Attorney General's office, the
2 Parties do hereby mutually agree to amend the fully executed Consent Judgment in this matter
3 (Effective Date August 1, 2022) to reflect a modification of the Reimbursement of Attorneys' Fees
4 and Costs to \$66,000 (sixty-six thousand) from \$72,000. The amendments shall be in the following
5 paragraphs to change only the amount, with no other amendments or modifications to the language of
6 the original Consent Judgment. The amendments shall be to sections 3.2(c) and 4, only changing the
7 amount, as follows

8 **3.2 Payments.**

9 (c) "Jeremy Fietz, Attorney at Law " in the amount of \$66,000 (sixty-six
10 thousand dollars) as payment for attorneys' fees and costs pursuant to Section
11 4 below.

12 **AND**

13
14 **4. REIMBURSEMENT OF FEES AND COSTS**

15 ...Defendant shall pay \$66,000 (sixty-six thousand) for fees and costs incurred as a result of
16 investigating, bringing this matter to Defendant's attention, and negotiating a settlement in the public
17 interest.

18
19
20 **AGREED:**

21 Date: 10/06/2022

22
23 By: 
24 Michael DiPirro

20 **AGREED:**

21 Date: 9 Oct 2022

22
23 By: Stephen M. Lobbin
24 BEE SALES COMPANY

PROOF OF SERVICE

I, David Bush, declare:

- I am an active member of the State Bar of California and not a party to the within action. My business address is 321 South Main Street #502, Sebastopol, CA 95472.

On October 10, 2022, I served a true copy of the attached documents, described as:

AMENDMENT TO CONSENT JUDGMENT

on each interested party as follows:

BY E- MAIL:

To Defendant Bee Sales Company:

Stephen M. Lobbin, Esq.
SML Avvocati P.C.
888 Prospect Street, Ste. 200
San Diego, CA 92037
sml@smlavvocati.com

To Office of the California Attorney General:

- by upload to the appropriate page on the Attorney General website; and
- by email to: Susan Fiering: susan.fiering@doj.ca.gov

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 10, 2022, at Sebastopol, California



David R. Bush