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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

FRESNO DIVISION

1 HEATHER BOONE and ROXANNE  
2 RIVERA, on behalf of themselves and all  
others similarly situated,

3 Plaintiffs,

4 CRISTIAN BARRERA, individually,

5 Plaintiff,

6 v.

7 AMAZON.COM SERVICES, LLC,

8 Defendant.

Case No. 1:21-CV-00241-ADA-BAM – LEAD  
Case No. 1:22-CV-146-ADA-BAM-MEMBER

**JOINT STATUS REPORT AND NOTICE OF  
SETTLEMENT**

9 Plaintiffs Heather Boone and Roxanne Rivera and Defendant Amazon.com Services LLC along  
10 with Plaintiff Cristian Barrera (collectively, the “Parties”), by and through their undersigned counsel  
11 of record, hereby file this Joint Status Report and Notice of Settlement.

12 The Parties are happy to report that through the efforts of mediator Lisa Klerman, they have  
13 reached a tentative settlement. Previously, the Parties participated in mediation with Ms. Klerman in  
14 April 2023 but no settlement was reached. Afterwards, the Parties continued to discuss the possibility  
15 of a settlement. Ms. Klerman continued to work with both sides and the Parties finally reached an  
16 agreement.

17 The Parties are currently working to document their settlement agreement. If, for any reason,  
18 the settlement cannot be documented, the Parties will inform the Court and will request a status  
19 conference to discuss the next steps for the case.

20 AGREED TO BY:

21 Dated: August 22, 2023

HODGES & FOTY, LLP

22  
23 By: /s/ Don J. Foty

24 Don J. Foty (admitted *pro hac vice*)

25 David W. Hodges (admitted *pro hac vice*)

26 *Attorneys for Plaintiffs Heather Boone and Roxanne  
27 Rivera*

1 Dated: August 22, 2023

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Bradley J. Hamburger  
3 Bradley J. Hamburger  
4 Tiffany Phan  
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*Attorneys for Defendant Amazon.com Services LLC*

6 Dated: August 22, 2023

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7 By: /s/ Kyle J. Ignatius  
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*Attorneys for Plaintiff Cristian Barrera*

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