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(Additional Parties and their Counsel on Following Pages)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOSE HERNANDEZ, JOSE OREGEL,
CLAUDIA LILIANA RAMIREZ MARTINEZ,
and JOSE J. GUZMAN, individuals on behalf of
themselves, the State of California, as a private
attorneys general, and on behalf of all others
similarly situated,

Plaintiffs,

v.

JBS PREPARED FOODS, INC., a Delaware
Corporation; and DOES 1 TO 50,

Defendants.

Case No. 2:25-cv-03096-TLN-AC

**JOINT STIPULATION TO DISMISS
PLAINTIFFS' TENTH CAUSE OF ACTION
WITHOUT PREJUDICE; ORDER**

Judge: Hon. Troy L. Nunley

Hearing: November 12, 2026

Time: 2:00 p.m.

Room: 2

COUNSEL FOR PLAINTIFF CLAUDIA LILIANA RAMIREZ MARTINEZ

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Attorneys for Defendant JBS Prepared Foods, Inc.

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiffs Jose Hernandez, Jose Oregel, Claudia Liliana Ramirez Martinez, and Jose J. Guzman (“Plaintiffs”) and Defendant JBS Prepared Foods, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs’ operative First Amended Consolidated Class and PAGA Representative Complaint asserts a Tenth Cause of Action for violation of California’s Unfair Competition Law, Business and Professions Code sections 17200 et seq. (the “UCL Claim”);

WHEREAS, on October 2, 2026, Defendant filed a Motion for Partial Judgment on the Pleadings (ECF No. 23) (the “Motion”) seeking dismissal of the UCL Claim presently set for hearing on November 12, 2026;

WHEREAS, the Parties met and conferred on October 15, 2026, and reached agreement to resolve the Motion on the terms set forth below; and

WHEREAS, in order to conserve the resources of the Parties and the Court, and without any admission or adjudication of the merits of any claim or defense, the Parties have agreed to resolve the Motion by this Stipulation;

NOW, THEREFORE, the Parties, by and through their respective counsel of record, hereby stipulate, and respectfully request that the Court order, as follows:

1. Plaintiffs’ Tenth Cause of Action for violation of Business and Professions Code sections 17200 et seq. is dismissed without prejudice for lack of equitable jurisdiction;

2. The dismissal of the Tenth Cause of Action is not an adjudication of the merits of any claim or defense, and all of Plaintiffs’ remaining causes of action are unaffected by this Stipulation;

3. The named Plaintiffs covenant and agree that they will not refile the dismissed UCL Claim in state or federal court, nor in any court of competent jurisdiction or other forum, each on his or her own behalf and in any representative or class capacity. This agreement binds only the named Plaintiffs and does not adjudicate, release, or otherwise affect the rights of any putative class member or other current or former employee of Defendant;

4. Defendant’s Motion for Partial Judgment on the Pleadings (ECF No. 23) is withdrawn, and the November 12, 2026 hearing is vacated; and

5. Each Party shall bear its own attorneys' fees and costs incurred in connection with the Motion.

IT IS SO STIPULATED.

Dated: October 16, 2026

MELMED LAW GROUP P.C.

/s/ Maria Burciaga

MARIA BURCIAGA

Attorneys for Plaintiffs Jose Hernandez and Jose Oregel

Dated: October 16, 2026

AEGIS LAW FIRM, P.C.

/s/ Joseph M. Szilagyi

JOSEPH M. SZILAGYI

Attorney for Plaintiff Claudia Liliana Ramirez Martinez

Dated: October 16, 2026

WORK LAWYERS P.C.

/s/ Jarrod Nakano

JARROD NAKANO

Attorney for Plaintiff Jose J. Guzman

Dated: October 16, 2026

SPENCER FANE LLP

/s/ Joseph H. Hunt

JOSEPH H. HUNT

Attorneys for Defendant JBS Prepared Foods, Inc.

Pursuant to Local Rule 131(e), the filing attorney attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the content of this filing and have authorized the filing.

ORDER

Pursuant to the Parties' Stipulation to Dismiss Plaintiffs' Tenth Cause of Action Without Prejudice, and good cause appearing, **IT IS HEREBY ORDERED** that:

1. Plaintiffs' Tenth Cause of Action for violation of California's Unfair Competition Law, Business and Professions Code sections 17200 et seq. (the "UCL Claim"), is DISMISSED WITHOUT PREJUDICE for lack of equitable jurisdiction;

2. The dismissal of the Tenth Cause of Action is not an adjudication of the merits of any claim or defense, and Plaintiffs' remaining causes of action are unaffected;

3. The named Plaintiffs shall not refile the dismissed UCL Claim in state or federal court, nor in any court of competent jurisdiction or other forum, each on his or her own behalf and in any representative or class capacity.

4. Defendant's Motion for Partial Judgment on the Pleadings (ECF No. 23) is withdrawn, and the November 12, 2026 hearing is VACATED; and

5. Each Party shall bear its own attorneys' fees and costs incurred in connection with the Motion.

IT IS SO ORDERED.

Dated: October 19, 2026



Troy L. Nunley
Chief United States District Judge