

EXHIBIT 2

**to [Proposed] Order Finally Approving Class
Action Settlement and Entering Judgment**

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Action Settlement and Entering Judgment**

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Attorneys for Plaintiffs
MAYRA CASAS and JULIO FERNANDEZ

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

MAYRA CASAS, JULIO
FERNANDEZ, individuals, on behalf
of themselves and all others similarly
situated,

Plaintiff,

vs.

VICTORIA'S SECRET STORES,
LLC, a business entity of unknown
form, LIMITED BRANDS, a business
entity of unknown form, and DOES 1
through 100, inclusive,

Defendants.

Case No. 2:14-CV-06412 GW (VBKx)

**FIRST ADDENDUM TO JOINT
STIPULATION RE: CLASS ACTION
SETTLEMENT**

Dist. Judge: Hon. George H. Wu
Mag. Judge: Hon. Victor B. Kenton

Complaint Filed: July 9, 2014
First Amended
Complaint Filed: September 5, 2014
Second Amended
Complaint Filed: December 29, 2014
Third Amended
Complaint Filed: February 13, 2015

Trial Date: None Set

1 **TO THE COURT AND TO ALL PARTIES AND THEIR RESPECTIVE**
2 **COUNSEL OF RECORD:**

3 This First Addendum to Joint Stipulation re: Class Action Settlement
4 (hereinafter, “Addendum”) is made and entered into by and between plaintiffs Mayra
5 Casas (“Casas”) and Julio Fernandez (“Fernandez”) (collectively, the “Plaintiffs”),
6 on behalf of themselves and on behalf of others similarly situated; and defendant
7 Victoria’s Secret Stores, LLC (“Defendant”), hereinafter collectively referred to as
8 the “Parties.”

9 Subject to the approval of the Court, the Action is being compromised and
10 settled pursuant to the terms and conditions set forth in the Joint Stipulation re: Class
11 Action Settlement (the “Settlement Agreement”) previously filed with this Court as
12 Exhibit A to the Saltzman Declaration filed in support of the Motion for Preliminary
13 Approval (Docket No. 80-1), and the terms of this Addendum thereto. This
14 Settlement shall be binding on Plaintiffs and the class they purport to represent,
15 Defendant, and on their respective counsel, subject to the terms and conditions of the
16 Settlement Agreement, this Addendum thereto, and the approval of the Court.

17 By way of this First Addendum to the Joint Stipulation re: Class Action
18 Settlement, **THE PARTIES HEREBY FURTHER STIPULATE AND AGREE** as
19 follows:

20 1. **Class Definition:** The Class Definition shall be amended to read as
21 follows:

22 “Class Members” shall mean all current and former employees of
23 Defendant, who worked in California during the Class Period and who
24 were classified as non-exempt from overtime pay, excluding Defendant,
25 its owners, directors, officers, executives, and all management personnel
26 whose responsibility it was to maintain and/or enforce the policies,
27 procedures, customs and/or business practices complained of in the
28 Action.

 Additionally, a Subclass shall be formed to represent all members of the
 foregoing Class whose employment with Defendants terminated during

1 the Class Period.

2 As used hereinabove, the term “Class Period” means the time frame
3 commencing four years prior to the date the original Complaint in this
4 action was filed, *i.e.*, July 9, 2010, and continuing until the date of
5 preliminary approval.

6 2. **Distribution Amendment:** In recognition of the inclusion of the
7 “former employees” subclass set forth above in Paragraph 1, the Parties agree to
8 amend the distribution formula so as to afford compensation to the members of the
9 “former employees” subclass, to reflect their entitlement to a share of the
10 contemplated Labor Code Section 203 payment built into the Settlement. Given the
11 value attributed thereto, the Parties hereby agree to increase the proportionate share
12 payable to each of the members of the “former employees” subclass by increasing
13 the value of each such subclass member’s share by a factor of 1.05 percent, such that
14 a five percent (5%) increase in each such share will be allocated to said claim. The
15 Settlement Administrator will be responsible for performing the necessary
16 calculations to effectuate this increased proportional payment.

17
18 3. **Financial Impact of Opt-Out Allocations:** With regard to the impact
19 of any and all persons who elect to exercise their right to “opt out” of the Settlement,
20 pursuant to the terms of Paragraphs 11 and 19(d) of the Settlement Agreement, it is
21 hereby agreed that consistent with the intended “non-reversionary” terms of this
22 Settlement, that any and all funds previously designated towards payment to any and
23 all “opt-outs” shall become part of the Net Settlement Amount, and therefore
24 available for proportional distribution to the participating Class Members.

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26 4. **Injunction Term:** The Parties hereby agree to delete, in its entirety,
27 Paragraph 21(e) of the Settlement Agreement.
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DATED: July 29, 2017

By: Mayra Casas
Mayra Casas
Plaintiff and Class Representative

DATED: July __, 2017

By: _____
Julio Fernandez
Plaintiff and Class Representative

DATED: July __, 2017

VICTORIA'S SECRET STORES, LLC

By: _____

DATED: July __, 2017

MARLIN & SALTZMAN, LLP

By: _____
Stanley D. Saltzman
Stephen P. O'Dell

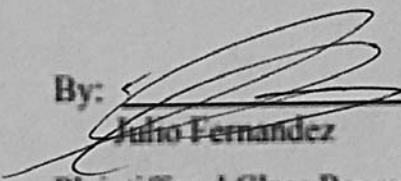
Attorneys for Plaintiffs
MAYRA CASAS and JULIO
FERNANDEZ

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DATED: July __, 2017

By: _____
Mayra Casas
Plaintiff and Class Representative

DATED: July 18, 2017

By: _____

Julio Fernandez
Plaintiff and Class Representative

DATED: July __, 2017

VICTORIA'S SECRET STORES, LLC

By: _____

MARLIN & SALTZMAN, LLP

By: _____
Stanley D. Saltzman
Stephen P. O'Dell

Attorneys for Plaintiffs
MAYRA CASAS and JULIO
FERNANDEZ

1
2 DATED: July __, 2017
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4 By: _____
5 Mayra Casas
6 Plaintiff and Class Representative

7 DATED: July __, 2017
8

9 By: _____
10 Julio Fernandez
11 Plaintiff and Class Representative

12 DATED: July 28, 2017
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14 VICTORIA'S SECRET STORES, LLC

15 By: DSla3nt
16 Denise Slaz4K
17 Vice President, Legal
18

19 DATED: July __, 2017
20

21 MARLIN & SALTZMAN, LLP

22 By: _____
23 Stanley D. Saltzman
24 Stephen P. O'Dell

25 Attorneys for Plaintiffs
26 MAYRA CASAS and JULIO
27 FERNANDEZ
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DATED: July __, 2017

By: _____
Mayra Casas
Plaintiff and Class Representative

DATED: July __, 2017

By: _____
Julio Fernandez
Plaintiff and Class Representative

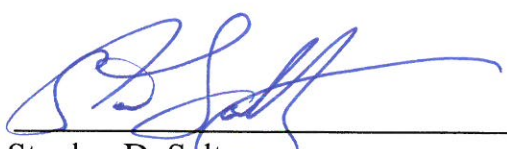
DATED: July __, 2017

VICTORIA'S SECRET STORES, LLC

By: _____

DATED: July 31, 2017

MARLIN & SALTZMAN, LLP

By:  _____
Stanley D. Saltzman
Stephen P. O'Dell

Attorneys for Plaintiffs
MAYRA CASAS and JULIO
FERNANDEZ

1 DATED: July 28, 2017

2 OGLETREE, DEAKINS, NASH,
3 SMOAK & STEWART, P.C.

4
5 By: 

6 Lori A. Bowman
7 Jennifer L. Katz

8 Attorneys for Defendant
9 VICTORIA'S SECRET STORES, LLC
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