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FILED: 11/19/2015

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CONSTRUCTION LABORERS TRUST
FUNDS FOR SOUTHERN
CALIFORNIA ADMINISTRATIVE
COMPANY, a Delaware limited liability
company,

Plaintiff,

vs.

OUR VALLEY FENCE, INC., a California
corporation; CAROL DEAN KING, an
individual; AMERICAN CONTRACTORS
INDEMNITY COMPANY, a California
corporation; DOE 1 through DOE 10,
inclusive,

Defendants.

CASE NO. CV 14-09084 MMM(JPRx)

~~[PROPOSED]~~ JUDGMENT
PURSUANT TO STIPULATION

PURSUANT TO THE STIPULATION FOR ENTRY OF JUDGMENT by and
between, CONSTRUCTION LABORERS TRUST FUNDS FOR SOUTHERN
CALIFORNIA ADMINISTRATIVE COMPANY, LLC, a fiduciary, administrator,
agent and assignee for collection to the CONSTRUCTION LABORERS TRUST
FUNDS FOR SOUTHERN CALIFORNIA ADMINISTRATIVE COMPANY, a
Delaware Limited Liability Company, and Defendants, OUR VALLEY FENCE,
INC., a California corporation and CAROL DEAN KING, an individual, and good

1 cause appearing therefor,

2 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that

3 Judgment is entered in in favor of the CONSTRUCTION LABORERS TRUST
4 FUNDS FOR SOUTHERN CALIFORNIA ADMINISTRATIVE COMPANY, a
5 Delaware limited liability company, the administrator, agent for collection and a
6 fiduciary to the Laborers Health And Welfare Fund For Southern California,
7 Construction Laborers Pension Trust For Southern California, Construction Laborers
8 Vacation Trust For Southern California, Laborers Training And Re-Training Trust
9 Fund For Southern California, Fund For Construction Industry Advancement, Center
10 For Contract Compliance, Laborers Contract Administration Trust Fund For Southern
11 California, Laborers' Trusts Administrative Trust Fund For Southern California, San
12 Diego County Construction Laborers Pension Trust Fund; San Diego Construction
13 Advancement Fund 2003; and Southern California Partnership For Jobs Industry
14 Advancement Fund (hereinafter collectively "TRUST FUNDS"), and against
15 Defendants, OUR VALLEY FENCE, INC., a California corporation
16 ("EMPLOYER"), and CAROL DEAN KING, an individual ("KING") as follows:

17 A. For the principal sum of \$250,000.00 against OUR VALLEY FENCE,
18 INC., a California corporation and of the \$250,000.00 principal amount due, CAROL
19 DEAN KING, an individual, is individually jointly and severally liable with
20 EMPLOYER for the sum of \$194,408.26 covering the period from January 10, 2010
21 to August 2015 ("JUDGMENT".)

22 B. The money JUDGMENT to be entered in this action is for known
23 delinquencies incurred for the period from January 2010 to August 2015, based upon
24 reports submitted by EMPLOYER covering time periods from June 2011 to August
25 2015; and audits of EMPLOYER's records covering time periods from January 2010
26 to May 2015 ONLY. EMPLOYER and KING have stipulated that since the audit of
27 EMPLOYER'S records did not cover the entire period of June 2015 to August 2015, ,
28 if any additional amounts are discovered to be owed by EMPLOYER during this time

1 period, the money judgment in this action shall not operate as a bar and/or have res
2 judicata effect or any other limitation of any legal right of the Plaintiff or TRUST
3 FUNDS to determine and seek collection of any amount due, or that comes due by
4 EMPLOYER and/or KING to any one or more of the TRUST FUNDS during the
5 period from June 2015 to August 2015..

6 DATED: 11/19/2015



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8 MARGARET M. MORROW
9 UNITED STATES DISTRICT JUDGE
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