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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION**

15 FARID KHAN, an individual, on behalf  
16 of himself and all others similarly  
17 situated,

17 Plaintiff,

18 v.

19 BOOHOO.COM USA, INC., a  
20 Delaware corporation, BOOHOO.COM  
21 UK LIMITED, a United Kingdom  
22 private limited company, BOOHOO  
23 GROUP PLC, a Jersey public limited  
24 company, and DOES 1-10, inclusive,

25 Defendants.

**CASE NO.: 2:20-cv-03332 GW (JEMx)**

Consolidated for Pretrial Purposes with:  
No. 2:20-cv-04658-GW-JEM  
No. 2:20-cv-04659-GW-JEM

**STIPULATION TO AMEND  
SETTLEMENT AGREEMENT  
DEADLINES**

HON. GEORGE H. WU.  
United States District Judge

Action Filed: April 9, 2020

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**STIPULATION**

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2 Based upon matters discussed in open court on June 2, 2022, Plaintiffs Farid Khan  
3 (“Khan”), Haya Hilton (“Hilton”), and Olivia Lee (“Lee”) (collectively, “Plaintiffs”), on  
4 the one hand, and Defendants Boohoo Group PLC, Boohoo.com USA, Inc., Boohoo.com  
5 UK Limited, PrettyLittleThing.com USA, Inc., PrettyLittleThing.com Limited,  
6 NastyGal.com USA, Inc., and Nasty Gal Limited (collectively, “Defendants”), on the  
7 other hand, by and through their respective counsel of record in this action, hereby  
8 stipulate and agree to amend the Settlement Agreement filed on May 24, 2022 (D.E. 133-  
9 1) as follows:

10 Section 3.2(c)[a] shall be amended as follows:

11 Deadline for Settlement Administrator to send Email Notice to Settlement Class  
12 Members: Sixty (60) calendar days following the Court’s issuance of the Preliminary  
13 Approval Order (Postcard Notice to be sent thereafter, as necessary, consistent with  
14 section 3.4(c) of this Agreement, but no later than ten (10) days after Email Notice is sent);

15 Section 3.2(c)[c] shall be amended as follows:

16 Deadline for mailing objections to the Clerk of the Court and counsel for the Parties:  
17 Sixty (60) calendar days from the date on which the Settlement Administrator disseminates  
18 Email Notice of the Preliminary Approval Order (hereafter, the “Objection Deadline”);

19 Section 3.2(c)[d] shall be amended as follows:

20 Deadline for Opting Out: Sixty (60) calendar days from the date on which the  
21 Settlement Administrator disseminates Email Notice of the Preliminary Approval Order  
22 (hereafter, the “Exclusion Deadline”);

23 Section 3.2(c)[h] shall be amended as follows:

24 Date of Fairness Hearing: At least 139 calendar days following the Court’s issuance  
25 of the Preliminary Approval Order.

26 Section 3.9 shall be amended as follows:

27 **Opting Out of the Class.** Settlement Class Members may elect to opt out, that is,  
28 to not to be part of the Class and not to be bound by this Agreement. To make this election,

1 for each of the three lawsuits for which a person is a Settlement Class Member, the  
2 Settlement Class Member must send a signed letter or postcard to the Settlement  
3 Administrator, consistent with the Exclusion Deadline set forth in Section 3.2, stating:  
4 (a) the name and case number of the Action from which the Settlement Class Member  
5 seeks to be excluded; (b) the full name, email address, physical address, telephone number,  
6 and Class Member ID of the person requesting exclusion; and (c) a signed statement that  
7 the Settlement Class Member is a legitimate Settlement Class Member in the referenced  
8 Action and does not wish to participate in the Settlement of that Action, postmarked no  
9 later than the Exclusion Deadline. The Settlement Administrator must serve on Class  
10 Counsel and Defendants' Counsel a list of Settlement Class Members who have timely  
11 and validly excluded themselves from the Settlement Class within ten (10) calendar days  
12 after the Exclusion Deadline.

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14 SO STIPULATED.  
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1 Dated: June 3, 2022

Respectfully submitted,<sup>1</sup>

2 ALMADANI LAW

3 /s/ Yasin M. Almadani  
4 Yasin M. Almadani, Esq.

5 AI LAW, PLC

6 /s/ Ahmed Ibrahim  
7 Ahmed Ibrahim, Esq.

8 *Attorneys for Plaintiff Individually and*  
9 *On Behalf of All Others Similarly Situated*

10 EVERSHEDES SUTHERLAND (US) LLP

11 /s/ Ronald W. Zdrojeski  
12 Ronald W. Zdrojeski, Esq.

13 *Attorneys for Defendants*

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28 <sup>1</sup> Pursuant to L.R. 5-4.3.4(a)(2), the party filing this document certifies that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing