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6 Attorneys for Defendants
STELLAR MANAGEMENT GROUP VII, LLC;
7 STELLAR MANAGEMENT GROUP, INC. d/b/a
QSI QUALITY SERVICE INTEGRITY; and THE
8 VINCIT COMPANY, LLC d/b/a THE VINCIT
GROUP and VINCIT ENTERPRISES

9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 DAVID CHAVEZ, on behalf of himself and all
others similarly situated,

14 Plaintiff,

15 vs.

16 STELLAR MANAGEMENT GROUP VII, LLC;
STELLAR MANAGEMENT GROUP, INC.
17 d/b/a QSI QUALITY SERVICE INTEGRITY;
and THE VINCIT COMPANY, LLC d/b/a THE
18 VINCIT GROUP and VINCIT ENTERPRISES,

19 Defendants.

Case No. 3:19-cv-01353-JCS

**DEFENDANTS' STATEMENT OF NON-
OPPOSITION TO APPROVAL OF
AMENDED SETTLEMENT**

STATEMENT OF NON-OPPOSITION

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2 On March 12, 2021, plaintiffs David Chavez and Vincent Slaughter (“Plaintiffs”) filed their
3 Motion for Preliminary Approval of Settlement, in which they requested that the Court (1) grant
4 preliminary approval of the Parties’ Settlement Agreement as to the Class; (2) conditionally certify
5 the Class for settlement purposes; (3) approve the proposed schedule and procedure for completing
6 the final approval process for the Settlement as to the Class, including setting a Final Approval
7 Hearing; (4) approve the Class Notice; (5) preliminarily appoint and approve Schneider Wallace
8 Cottrell Konecky LLP as Class Counsel; (6) preliminarily approve Class Counsel’s request for
9 attorneys’ fees and costs; (7) preliminarily appoint and approve Plaintiffs Chavez and Slaughter as
10 Class Representatives for the Class; (8) preliminarily appoint and approve Heffler Claims Group as
11 the Settlement Administrator; (9) approve the Class Notice; (10) approve the Parties’ Settlement
12 Agreement as to the Collective; and (12) approve the Collective Notice. *See* Dkt. 134.

13 In response to guidance from the Court at the hearing conducted on April 16, 2021, the Parties
14 thereafter agreed to various amendments to the Settlement Agreement, including to the class and
15 collective notices attached as Exhibits C and D thereto. On May 7, 2021, Plaintiffs filed
16 supplemental briefing with additional information requested by the Court as pertinent to its
17 consideration of the Motion for Preliminary Approval, along with the Parties’ amendment to the
18 Settlement Agreement and a revised proposed order. *See* Dkt. 141.

19 Pursuant to Local Rule 7-3(b), defendants Stellar Management Group VII, LLC, Stellar
20 Management Group, Inc d/b/a QSI Quality Service Integrity, and The Vincit Company, LLC d/b/a
21 The Vincit Group and Vincit Enterprises (“Defendants”) hereby give notice that they do not oppose
22 preliminary approval of the Parties’ Settlement, as amended. Nothing in this Statement of Non-
23 Opposition shall constitute an admission of liability or wrongdoing or waiver of any defense that may
24 be available to Defendants in the event the Court does not approve the Parties’ Settlement.
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Respectfully submitted,

Dated: May 7, 2021

By: /s/ Stephen L. Tausch
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on May 7, 2021. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2021.

/s/ Stephen L. Taesch
Stephen L. Taesch

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