

1 Douglas Caiafa, Esq. (SBN 107747)
DOUGLAS CAIAFA, A Professional Law Corporation
2 11845 West Olympic Boulevard, Suite 1245
Los Angeles, California 90064
3 (310) 444-5240 - phone; (310) 312-8260 - fax
Email: dcaiafa@caiafalaw.com

4 Christopher J. Morosoff, Esq. (SBN 200465)
LAW OFFICE OF CHRISTOPHER J. MOROSOFF
5 77-760 Country Club Drive, Suite G
Palm Desert, California 92211
6 (760) 469-5986 - phone; (760) 345-1581 - fax
Email: cjmorosoff@morosofflaw.com

7 Greg K. Hafif, Esq. (SBN 149515)
8 Michael G. Dawson, Esq. (SBN 150385)
LAW OFFICE OF HERBERT HAFIF
9 269 W. Bonita Avenue
Claremont, California 91711
10 (909) 624-1671 - phone; (909) 625-7772 - fax
Email: ghafif@hafif.com

11 Attorneys for Plaintiffs STACI CHESTER, et al.

12
13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 EASTERN DIVISION
16

17 STACI CHESTER, et al.,
18 Plaintiffs,
19 vs.
20 TJX COMPANIES, INC., et al.,
21 Defendants.

5:15-cv- 01437 ODW (DTBx)

**Related Cases:
5:15-cv-01475-DDP-DTB
5:15-cv-01480-DDP-DTB**

NOTICE OF SETTLEMENT

(Assigned to the Hon. Otis D. Wright, II)

Complaint Filed: July 17, 2017
Trial Date: TBD

1 TO THE COURT AND ALL INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that Plaintiffs Staci Chester et al. ("Plaintiffs") and
3 Defendants The TJX Companies, Inc., et al. ("Defendants") (collectively, the
4 "Parties"), hereby file this Notice of Settlement. Following a mediation session
5 before the Hon. Margaret A. Nagle (ret.) of JAMS on May 22, 2017, and numerous
6 follow-up negotiations with the assistance of Judge Nagle over the course of the
7 following weeks, the Parties reached a settlement and executed a binding
8 Memorandum of Understanding. Within thirty (30) days, the Parties will file the
9 required paperwork for preliminary approval of the class action settlement. The
10 Parties respectfully request that the Court stay all pending matters and deadlines in
11 the case pending approval of the class action settlement.

12 Dated: July 13, 2017

Respectfully submitted,
DOUGLAS CAIAFA, A PROF. LAW CORP.

13
14
15 By: /s/ Douglas Caiafa
Douglas Caiafa
16 Attorneys for Plaintiffs
STACI CHESTER, et al.

17
18
19 Dated: July 13, 2017

Respectfully submitted,
ROPES & GRAY LLP

20
21 By: /s/ John P. Bueker
John P. Bueker
22 Attorneys for Defendants The TJX Companies,
23 et al.

ECF ATTESTATION

I, Douglas Caiafa, am the ECF User whose ID and password are being used to file this Notice of Settlement. In accordance with General Order 08-02, VIII.B, concurrence in the filing of this document has been obtained from John P. Bueker, counsel for Defendants The TJX Companies, et al., and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: July 13, 2017

Respectfully submitted,
DOUGLAS CAIAFA, A PROF. LAW CORP.

By: /s/ Douglas Caiafa
Douglas Caiafa
Attorneys for Plaintiffs
STACI CHESTER, et al.