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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

INES BURGOS and MONGKOL
MAHAVONGTRAKUL, individually
and on behalf of other similarly
situated individuals,

Plaintiff,

vs.

SUNVALLEYTEK
INTERNATIONAL, INC.,

Defendant.

Case Number: 4:18-cv-06910-HSG

The Hon. Haywood S. Gilliam

This Amendment to the May 6, 2020 Settlement Agreement ("Amendment") is entered into by and among plaintiffs Ines Burgos and Mongkol Mahavonktrakul (collectively, "Plaintiffs") and Defendant Sunvalleytek International, Inc. ("Sunvalleytek" or "Defendant").

For purposes of the Settlement Agreement, the settlement class shall be defined as: All consumers who have purchased any of the Covered Products in the United States. The Proposed Order And Judgment is accordingly amended, and attached hereto as Exhibit C.

The Settlement Agreement is hereby amended to include a proposed notice plan. Notice in the form attached hereto as Exhibit A shall be posted in a prominent place(s) on Finkelstein, Blankinship, Frei-Pearson & Garber, LLP's website(s) (fbfglaw.com and 4classaction.com) 60 days before the Court holds a telephonic fairness hearing regarding approval of the Settlement Agreement. Notice in the form attached hereto as Exhibit B shall be posted in a prominent place(s) on Defendant's website (www.sunvalleytek.com) 60 days before the Court holds a telephonic fairness hearing regarding approval of the Settlement Agreement. Any written submissions by class members must be sent to the Court 15 days before the fairness hearing.

IN WITNESS WHEREOF, each of the Parties, by and through their authorized counsel of record, has caused the Agreement to be executed on their behalf, all as of the day set forth below.

Dated: 7/2-16/00

By:
Kerberly A. Donovan
GCA Law Partners

*Attorney for Sunvalleytek
International, Inc.*

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Dated: Sept. 24, 2020

By: 

D. Greg Blankinship
Finkestein, Blankinship, Frei-Pearson
& Garber, LLP

*Attorney for Plaintiffs and for the
Settlement Class Members*