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**FILED**  
**October 19, 2023**  
Clerk of the Court  
Superior Court of CA  
County of Santa Clara

21CV381890  
By: rwalker

7 Attorneys for Defendant  
ALL-PRO BAIL BONDS, INC.  
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10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

11 COUNTY OF SANTA CLARA  
12

13 RAKLY DOMINGUEZ and GRACE  
DOMINGUEZ, individually and on behalf of all  
14 others similarly situated,

15 Plaintiffs,

16 vs.

17 ALL-PRO BAIL BONDS, INC., a California  
Corporation, BANKERS INSURANCE  
18 COMPANY, a Florida Corporation, and  
BANKERS SURETY SERVICES, INC., a  
19 Florida Corporation,

20 Defendants.  
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CASE NO. 21CV381890

**JOINT STIPULATION FOR ENTRY OF  
INJUNCTION; ~~PROPOSED~~ ORDER**

1 Plaintiffs Rakly Dominguez and Grace Dominguez (“Plaintiffs”) and Defendant All-Pro Bail  
2 Bonds (“All-Pro”), hereby stipulate and request that the Court enter a permanent injunction as provided  
3 for under the Parties’ Settlement Agreement and this Court’s Order of Final Approval and Judgment.  
4

5 **RECITATIONS**

6 WHEREAS, Plaintiffs initiated a class action against All-Pro and other Defendants on or about  
7 May 14, 2021;

8 WHEREAS, the Parties entered into a Settlement Agreement on or about August 22, 2023;

9 WHEREAS, as stated in the Settlement Agreement, All-Pro has not admitted to any liability or  
10 wrongdoing in regards to the claims in the class action lawsuit, and in fact has specifically denied any  
11 such liability for the claims asserted in the class action lawsuit;

12 WHEREAS, on September 20, 2023, the Court held a final approval hearing and approved the  
13 Settlement Agreement, and requested that the Parties submit a Revised Order of Final Approval and  
14 Judgment and a Stipulation for Entry of Injunction; and

15 WHEREAS, this injunction is stipulated agreed as required by the relevant terms of the Settlement  
16 Agreement.

17 **STIPULATION**

18 THEREFORE, Plaintiffs and All-Pro stipulate and agree to the entry of a permanent injunction as  
19 follows:

20 All-Pro, and persons or entities acting in concert with All-Pro, are enjoined from the date of entry  
21 of this Injunction onwards, from collecting from all non-spouse co-signers that signed an All-Pro  
22 Agreement at any time prior to May 1, 2021, any outstanding installment premium payments remaining  
23 due and owing on All-Pro Agreements executed prior to May 1, 2021.  
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1 IT IS SO STIPULATED.

2  
3 DATED: October 19, 2023

HAMMONDLAW, P.C.

4 By: s/ Julian Hammond

5 Julian Hammond  
6 Attorneys for Plaintiffs Rakly Dominguez  
7 and Grace Dominguez

8 ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

9 By: /s/ Gary A. Nye

10 Gary A. Nye  
11 Attorneys for Defendant All-Pro Bail Bonds

12 **PROPOSED ORDER**

13 The Court, having reviewed and considered the Settlement Agreement between the Parties, the  
14 Plaintiffs' Motion (and supporting evidence) for Final Approval of the Class Action Settlement, and this  
15 Stipulation between Plaintiffs and All-Pro for the entry of a permanent injunction, and good cause  
16 appearing, hereby enters a permanent injunction as follows:

17 All-Pro, and persons or entities acting in concert with All-Pro, are enjoined from the date of entry  
18 of this Injunction onwards, from collecting from all non-spouse co-signers that signed an All-Pro  
19 Agreement at any time prior to May 1, 2021, any outstanding installment premium payments remaining  
20 due and owing on All-Pro Agreements executed prior to May 1, 2021.

21  
22 IT IS SO ORDERED.

23  
24 Dated: October 19, 2023

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26 HON. THEODORE ZAYNER  
27 Judge of the Superior Court  
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