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FILED
TULARE COUNTY SUPERIOR COURT
SOUTH COUNTY JUSTICE CENTER

APR 15 2021

STEPHANIE CAMERON, CLERK
BY: LORA ANDRADE

9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF TULARE

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12 SANTOS CALVARIO NAVA,

13 Plaintiff,

14 v.

15 PAUL R. CHAVEZ INVESTMENT GROUP;
16 and PAUL R. CHAVEZ,

17 Defendants.

Case No. DCU 286588

STIPULATION FOR ENTRY OF
JUDGMENT

18
19 IT IS HEREBY STIPULATED by and between the parties, plaintiff SANTOS
20 CALVARIO NAVA ("Nava"), and defendants PAUL R. CHAVEZ INVESTMENT GROUP and
21 PAUL R. CHAVEZ (collectively "Defendants") (Nava and Defendants are hereinafter referred to
22 collectively as the "Parties"), that the above-referenced case has been settled pursuant to California
23 Code of Civil Procedure §664.6, and that Judgment shall be entered against Defendants, as
24 follows:
25

- 26 1. That Judgment in the above-entitled action be entered in favor of Nava and against
27 Paul R. Chavez Investment Group and Paul R. Chavez, jointly and severally, in the total sum of
28 \$204,500.00.

1 2. IT IS FURTHER STIPULATED that Nava will accept as Full Satisfaction of the
2 Judgment of \$204,500.00 to be paid as follows:

- 3 a. Payment of the sum of \$40,000.00 to be made no later than January 1, 2021;
4 b. Payment of the sum of \$20,000.00 to be made no later than February 1, 2021;
5 c. Payment of the sum of \$20,000.00 to be made no later than March 1, 2021;
6 d. Payment of the sum of \$20,000.00 to be made no later than April 1, 2021;
7 e. Payment of the sum of \$20,000.00 to be made no later than May 1, 2021;
8 f. Payment of the sum of \$20,000.00 to be made no later than June 1, 2021;
9 g. Payment of the sum of \$20,000.00 to be made no later than July 1, 2021;
10 h. Payment of the sum of \$20,000.00 to be made no later than August 1, 2021; and
11 i. Payment of the sum of \$24,500.00 to be made no later than September 1, 2021.

12 3. IT IS FURTHER STIPULATED that Nava will not file this Stipulation in a Court
13 of competent jurisdiction as long as Defendants make the payments fully and timely specified in
14 Paragraph 2.
15

16 4. IT IS FURTHER STIPULATED that all payments shall be made payable to the
17 Christenson Law Firm, LLP for Santos Calvario Nava, and shall be delivered to the Christenson
18 Law Firm, LLP, 472 W. Putnam Ave., Porterville, CA 93257.
19

20 5. IT IS FURTHER STIPULATED that this Stipulation will not be acted on or
21 recorded unless there is an uncured default of the terms of this Stipulation.
22

23 6. IT IS FURTHER STIPULATED that if Defendants fail to make the payments as
24 required in Paragraph 2 herein, and in the Settlement Agreement that is being entered into
25 concurrently and is incorporated herein by reference, Nava will provide written notice to
26 Defendants by electronic mail (E-Mail) to paulrchavez@gmail.com, and Defendants shall have
27 five (5) days from the day of the written notice in which to cure the noncompliance. If the default
28 goes uncured, Nava shall be entitled to proceed via Ex Parte Application to enter this Judgment on

1 the sixth day in the amount of \$204,500.00 less any payments previously received from
2 Defendants.

3 7. IT IS FURTHER STIPULATED that findings of fact and conclusion of law are
4 hereby waived.

5 8. IT IS FURTHER STIPULATED that any Judgment entered in accordance with the
6 terms and conditions of this Stipulation may be rendered and entered by a Court Commissioner.
7

8 9. IT IS FURTHER STIPULATED that upon filing this Stipulation, Judgment shall be
9 entered and become final for all purposes. Upon Entry of Judgment, Defendants waive any right
10 to appeal therefrom.

11 10. IT IS FURTHER STIPULATED that Defendants by entering into this Stipulation,
12 make a general appearance in the proceedings herein and/or in any proceedings hereinafter
13 commenced and thereby consent to the exercise of the jurisdiction of all California Courts with
14 respect to proceedings herein and/or in any proceedings hereinafter commenced and consent to the
15 jurisdiction of said Court to issue any Order, Judgment, or to take any other action with respect to
16 the proceedings herein and/or any proceedings hereinafter commenced.
17

18 11. IT IS FURTHER STIPULATED that Nava may enforce the terms of this
19 Stipulation pursuant to the provisions of California Code of Civil Procedure §664.6.

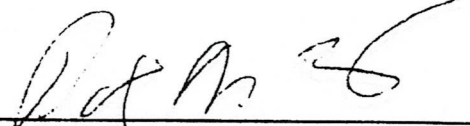
20 12. IT IS FURTHER STIPULATED that Defendants waive their rights to Notice of
21 Entry of Judgment and Notice of Hearing Re: Entry of Judgment, if any, and that Judgment may be
22 entered on an Ex Parte Application of Plaintiff supported by Declaration(s) under penalty of
23 perjury.
24

25 13. IT IS FURTHER STIPULATED that if any action at law or equity is brought to
26 enforce or interpret this stipulation, including but not limited to efforts required to obtain Judgment
27 hereunder upon default under paragraph 6, the prevailing party shall be entitled to recover all costs
28


1 incurred in such action or proceeding, including reasonable attorney's fees, in addition to any other
2 relief to which they may otherwise be entitled.

3 IT IS SO STIPULATED.

4
5 Dated: October 23, 2020

By: 
Paul R. Chavez Investment Group
Officer: _____
Title: _____

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9 Dated: October 23, 2020

By: 
Paul R. Chavez

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12 Dated: October _____, 2020

By: _____
Santos Calvario Nava

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