

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the matter of the Appeal of:) Hearing Examiner Files:
)
BAJA CONCRETE USA CORP., ROBERTO) No. LS-21-002
CONTRERAS, NEWWAY FORMING INC.,) LS-21-003
and ANTONIO MACHADO) LS-21-004
)
from a Final Order of the Decision issued by)
the Director, Seattle Office of Labor Standards) **STIPULATED EXHIBIT LIST**
)

The parties, by and through their attorneys of record, submit the following list exhibits
pursuant to the June 23, 2023 Order for Continuance.

I. TRIAL EXHIBITS

City Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
1	Forler-Grant Dep. - Newway Forming CR 30(b)(6) 05052022 DUPLICATE: City 1, Machado 34	X	X	X	X
2	Antonio Machado Dep. 02012022	X	X	X	X
3	DeArmas Dep. – Baja Concrete USA 30(b)(6) 04262022 DUPLICATE: City 3, Machado 38	X	X	X	X
4	De Armas Affidavit (for dep.) 04262022	X	X	X	X
5	Daron Williams Deposition 02032022	X	X	X	X
6	Keppinger Dep. – OLS 30(b)(6) 04282022 DUPLICATE: City 6, Machado 35	X	X	X	X
7	Williams Dep. – OLS 30(b)(6) 04282022 DUPLICATE: City 7, Machado 36	X	X	X	X

STIPULATED EXHIBIT LIST - 1

Ann Davison
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City Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
8	DeArmas Deposition (individual) 05112022 DUPLICATE: City 8, Machado 37	X	X	X	X
9	Daron Williams Declaration – City’s MSJ (no exhibits) 06292022	X		X	X
10	Newway Safety Sign-In Sheet 03212019 APPBAJA0163-0176 DUPLICATE: City 10, Baja 104, NW 5	Hearing Examiner Ex. 7			
11	OLS Final Order - issued 08252021 DUP/OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X	X	X	X
12	Laura Hurley and Jonathan Parra Ponce Declarations (English/Spanish) DUPLICATE: City 12, Baja 158 NOTE: BAJA 158 admitted as HEX Ex. 2	X	X		X
13	Paycheck Stubs - Cristhian Pelaez Ruiz APPBAJA0546-APPBAJA0558 (11/18-8/19) DUPLICATE: City 13, Baja 52	X	X	X	X
14	Paycheck Stubs - Alejandro Fiol APPBAJA0401- APPBAJA0413	Hearing Examiner Ex. 11			
15	Paycheck Stubs - John Hinestroz Diaz APPBAJA0830- APPBAJA0836	Hearing Examiner Ex. 19			
16	Paycheck Stubs - Claudio Gamboa APPBAJA0508- APPBAJA0545	Hearing Examiner Ex. 17			
17	Paycheck Stubs - Hector Cespedes Rivera APPBAJA0729- APPBAJA0763	Hearing Examiner Ex. 14			
18	Paycheck Stubs - Matias Catalan Toro APPBAJA1049- APPBAJA1064	Hearing Examiner Ex. 3			
19	Paycheck Stubs - Patricio Fernandez Borquez APPBAJA1089- APPBAJA1125	Hearing Examiner Ex. 26			
20	Paycheck Stubs - Luis Andres Arriagada Aguilera APPBAJA0951- APPBAJA0968 DUPLICATE: City 20, Baja 76	X	X	X	X
21	Paycheck Stubs - Jose Estrada Parra APPBAJA0866- APPBAJA0900 DUPLICATE: City 21, Baja 71	X	X	X	X
22	Paycheck Stubs - Jose Acosta Caballero APPBAJA0837- APPBAJA0857	Hearing Examiner Ex. 24			
23	Paycheck Stubs – Ivan Ponce_Redacted APPBAJA0785- APPBAJA0811	Hearing Examiner Ex. 1			
24	Paycheck Stubs – Angel Gomez Chavez APPBAJA0414- APPBAJA0430	Hearing Examiner Ex. 18			

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25	Machado OLS Interview Notes SEATTLE-OLS-1060- SEATTLE-OLS-1067 DUPLICATE: City 25, Baja 120, Newway 24, See also Baja 121-122	X	X	X	X
26	Angel Gomez Chavez Deposition 02142023	X	X		X
27	Angel Gomez Chavez Deposition Corrections 03102023	X	X		X
28	Jonathan Parra Ponce Deposition 02142023	X	X		X
29	Jonathan Parra Ponce Deposition Corrections 03102023	X	X		X
30	Matias Catalan Toro Deposition 02172023	Hearing Examiner Ex. 5			
31	Matias Catalan Toro Deposition Corrections 03152023	Hearing Examiner Ex. 6			
32	John Edward Diaz Deposition 02172023	X	X		X
33	John Edward Diaz Deposition Corrections 03192023	X			X
34	Baja Invoices and Timesheets 02022018 – 12222018 APPBAJA0185- APPBAJA0247 DUPLICATE: City 34, Baja 1 NOTE: City 34 admitted as HEX Ex. 13	Hearing Examiner Ex. 13			
35	Baja Invoices and Timesheets 12302018 – 12282019 APPBAJA0248- APPBAJA0359 DUPLICATE: City 35, Baja 2 NOTE: City 35 admitted as HEX Ex. 12	Hearing Examiner Ex. 12			
36	Baja Invoices and Timesheets 01132020 – 07112020 APPBAJA0360- APPBAJA0400 DUPLICATE: City 36, Baja 3	X	X	X	X
37	Baja USA Invoice 055 dated 05082020 APPBAJA0002 DUPLICATE: City 37, (Part of) Machado 3, (Part of) Baja 116, (Part of) NW 18, (Part of) NW 34	X		X	X
38	Baja USA deductions and contributions APPBAJA0003 DUPLICATE: City 38, Machado 39, Machado 8, (Part of) Machado 3, (Part of) Baja 116, (Part of) NW 18, (Part of) NW 34	X	X	X	X
39	Baja Payroll Summary - June 2020 APPBAJA0131 DUPLICATE: City 39, Baja 94	X		X	X

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40	Baja Payroll Summary - July 2020 APPBAJA0132- APPBAJA0133 DUPLICATE: City 40, Baja 95	X		X	X
41	Baja Payroll Summary - August 2020 APPBAJA0134- APPBAJA0135 DUPLICATE: City 41, Baja 96	X		X	X
42	Baja Responses to OLS RFI APPBAJA0154- APPBAJA0162 DUPLICATE: City 42, Baja 157, Machado 9,40, Newway 13	X	X	X	X
43	Baja Complaint v Newway KCSC Case 22-2-04760-7	X		X	X
44	Newway Answer_Counterclaim v Baja KCSC Case 22-2-04760-7	X		X	X
45	Baja Answer v. Newway KCSC Case 22-2-04760-7	X		X	X
46	Paycheck Stubs – Antonio Yevenes APPBAJA0432- APPBAJA0439 DUPLICATE: City 46, Baja 48	X	X	X	X
47	Paycheck Stubs – Bulfrano Brito APPBAJA0440- APPBAJA0452 DUPLICATE: City 47, Baja 49	X	X	X	X
48	Paycheck Stubs – Cristian Navejas APPBAJA0559- APPBAJA0593 DUPLICATE: City 48, Baja 53	X	X	X	X
49	Paycheck Stubs – David Giron APPBAJA0594- APPBAJA0597 DUPLICATE: City 49, Baja 54	X	X	X	X
50	Paycheck Stubs – David San Roman Mendo APPBAJA0598- APPBAJA0603 DUPLICATE: City 50, Baja 55	X	X	X	X
51	Paycheck Stubs – Diego Rojas Villaseca APPBAJA0604- APPBAJA0605 DUPLICATE: City 51, Baja 56	X	X	X	X
52	Paycheck Stubs – Edison Chimborazo Macas APPBAJA0606- APPBAJA0638 DUPLICATE: City 52, Baja 57	X	X	X	X
53	Paycheck Stubs – Emeterio Collins Lopez APPBAJA0639- APPBAJA0646 DUPLICATE: City 53, Baja 58	X	X	X	X
54	Paycheck Stubs – Evelio Alvarez Ruiz APPBAJA067- APPBAJA0662 DUPLICATE: City 54, Baja 59	X	X	X	X

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55	Paycheck Stubs – Gabriel Rios Ortiz APPBAJA0663- APPBAJA0670 DUPLICATE: City 55, Baja 60	X	X	X	X
56	Paycheck Stubs – Gerardo Guzman Barragan APPBAJA0671- APPBAJA0684 DUPLICATE: City 56, Baja 61	X	X	X	X
57	Paycheck Stubs – Gerardo Valencia APPBAJA0685- APPBAJA0728 DUPLICATE: City 57, Baja 62	X	X	X	X
58	Paycheck Stubs – Israel Avila Gasca APPBAJA0764- APPBAJA0784 DUPLICATE: City 58, Baja 64	X	X	X	X
59	Paycheck Stubs – Javier Alfaro Perez APPBAJA0812- APPBAJA0820 DUPLICATE: City 59, Baja 66	X	X	X	X
60	Paycheck Stubs – Jesus Ramon Castro Mendoza APPBAJA0821- APPBAJA0829 DUPLICATE: City 60, Baja 67	X	X	X	X
61	Paycheck Stubs – Jose Alvarez Rodriguez APPBAJA0858- APPBAJA0865 DUPLICATE: City 61, Baja 70	X	X	X	X
62	Paycheck Stubs – Jose Vega Hernandez APPBAJA0901- APPBAJA0921 DUPLICATE: City 62, Baja 72	X	X	X	X
63	Paycheck Stubs – Josue Osuna Tallabas APPBAJA0922- APPBAJA0931 DUPLICATE: City 63, Baja 73	X	X	X	X
64	Paycheck Stubs – Julio Caballero Pacheco APPBAJA0932- APPBAJA0940 DUPLICATE: City 64, Baja 74	X	X	X	X
65	Paycheck Stubs – Lucas Ayala_Redacted APPBAJA0941- APPBAJA0950 DUPLICATE: City 65, Baja 75	X	X	X	X
66	Paycheck Stubs – Luis Fernandez Rosas APPBAJA0969- APPBAJA0974 DUPLICATE: City 66, Baja 77	X	X	X	X
67	Paycheck Stubs – Luis Garcia_Redacted APPBAJA0975- APPBAJA0980 DUPLICATE: City 67, Baja 78	X	X	X	X
68	Paycheck Stubs – Manuel Camus Valdes APPBAJA0981- APPBAJA1022 DUPLICATE: City 68, Baja 79	X	X	X	X
69	Paycheck Stubs – Marco Villasenor Harbolte APPBAJA1023- APPBAJA1040 DUPLICATE: City 69, Baja 80	X	X	X	X

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70	Paycheck Stubs – Martin Ayala Ochoa APPBAJA1041- APPBAJA1048 DUPLICATE: City 70, Baja 81	X	X	X	X
71	Paycheck Stubs – Miguel Alfaro Pinto APPBAJA1065- APPBAJA1073 DUPLICATE: City 71, Baja 83	X	X	X	X
72	Paycheck Stubs – Noe Rios Estrada APPBAJA1074- APPBAJA1088 DUPLICATE: City 72, Baja 84	X	X	X	X
73	Paycheck Stubs – Ramon Duenas Gomez APPBAJA1126- APPBAJA1141 DUPLICATE: City 73, Baja 86	X	X	X	X
74	Paycheck Stubs – Raul Hiraes Cuevas APPBAJA1142- APPBAJA1160 DUPLICATE: City 74, Baja 87	X	X	X	X
75	Paycheck Stubs – Roberto Hiralez Colin APPBAJA1161- APPBAJA1202 DUPLICATE: City 75, Baja 88	X	X	X	X
76	Paycheck Stubs – Roberto Lopez Hernandez APPBAJA1203- APPBAJA1209 DUPLICATE: City 76, Baja 89	X	X	X	X
77	Paycheck Stubs – Ruben Gonzalez APPBAJA1210- APPBAJA1236 DUPLICATE: City 77, Baja 90	X	X	X	X
78	Paystub – Machado \$4878 APPBAJA0431 DUPLICATE: City 78, Baja 47, NW 35	X		X	X
79	Email - Forler-Grant to Claudia 12312020	X	X	X	X
80	Email Roberto to Newway 10262020	X	X	X	X
81	Email Forler-Grant 09172019 BajaConcrete DUPLICATE: City 81, (Part of) Machado 6	X		X	X
82	Email Forler-Grant 06152020 BajaConcrete	X			
83	Email Forler-Grant L&I 09162019 DUPLICATE: City 83, Baja 98 (APPBAJA00136-00137), NW 7	X	X	X	X
84	Email Forler-Grant fine payment 05272020	X		X	X
85	Email Forler-Grant Baja sign in 09182019 X-Ref/SIMILAR: City 85, (Part of) Baja 99 (APPBAJA0151), (Part of) NW 8, (Part of) Machado 6	X		X	X
86	Email Forler-Grant Baja Timesheets 04182019	X	X		

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87	Email Forler-Grant Baja pymnts. 02112020	X	X	X	X
88	Email Forler-Grant Time clock 01142021	X		X	
89	Email Nancy Chin Payments 12042019	X		X	X
90	Email Mercedes DeArmas Worker's Comp 06182020	X	X	X	X
91	Newway Responses to RFI 06122020	X		Excluded per HEX MIL Order	Excluded per HEX MIL Order
92	Claudia Penunuri Contact Information See also City 93-94, 97-98, Baja 107, 112, Machado 12, 13	X		X	X
93	Baja Articles of Incorporation SEATTLE-OLS-0009- SEATTLE-OLS-0010 DUPLICATE: City 93, (Part of) Baja 112, Machado 12	X		X	X
94	Claudia Penunuri Annual Report SEATTLE-OLS-0011 DUPLICATE: City 94, (Part of) Baja 112	X		X	X
95	Denny Way Project Information SEATTLE-OLS-0013- SEATTLE-OLS-0024	X		X	
96	Baja License L&I SEATTLE-OLS-0027- SEATTLE-OLS-0032 OVERLAP: City 96, Machado 13, NW 36	X		X	X
97	Baja Annual Report SOS SEATTLE-OLS-0033 -0035	X		X	
98	Baja Certificate of Registration SEATTLE-OLS-0036 DUPLICATE: City 98, Baja 107. X-Ref/SIMILAR: City 93-94, 97, 112, Machado 12, 13	X	X	X	X
99	Newway – Dept of Revenue SEATTLE-OLS-0037- SEATTLE-OLS-0045 DUPLICATE: City 99, (Part of) Machado 14, (All of) Baja 111	X			
100	Newway Company Information SEATTLE-OLS-0046- SEATTLE-OLS-0048 DUPLICATE: City 100, Baja 110	X			
101	Newway Projects Information SEATTLE-OLS-0049- SEATTLE-OLS-0051 OVERLAP: (Part of) City 101, (Part of) Baja 109 (SEATTLE-OLS-0051)	X			
102	Denny Way Project Information SEATTLE-OLS-0055- SEATTLE-OLS-0060	X			

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103	Notice to Seattle Employees SEATTLE-OLS-0062- SEATTLE-OLS-0063	X		X	X
104	Baja NOI & RFI SEATTLE-OLS-0062- SEATTLE-OLS-0075	X		X	X
105	Newway & Machado NOI & RFI SEATTLE-OLS-0076- SEATTLE-OLS-0082 DUPLICATE: (Part of) City 105, (all of) Newway 21 (Seattle-OLS-0076)	X		X	X
106	Declaration of D. Williams SDT 07162020 SEATTLE-OLS-0097- SEATTLE-OLS-0101 DUPLICATE: City 106, (Part of) Baja 127 (SEATTLE-OLS-PDR-2279-2283), Machado 15 (SEATTLE-OLS-0097-0101), Newway 23 (SEATTLE-OLS-0097-0101)	X		X	X
107	Emails OLS & Mercedes DeArmas SEATTLE-OLS-0112- SEATTLE-OLS-0116	X		X	X
108	OLS Subpoena Duces Tecum 07162020 SEATTLE-OLS-0123- SEATTLE-OLS-0128 DUP/OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X		X	X
109	Forler-Grant Email 2-9 payment 03112019	X	X	X	X
110	Forler-Grant Email re Subs with Payroll 04072020	X		X	X
111	Baja Employment letter – Ruben Gonzalez SEATTLE-OLS-0989	X		X	X
112	Roberto Email to payroll 12162018 APPBAJA1353	X		X	X
113	W4 Emeterio Collins Lopez APPBAJA1382 DUPLICATE: City 113, (Part of) Baja 102	X		X	X
114	W4 Raul Hiraes Cuevas APPBAJA1384 DUPLICATE: City 114, (Part of) Baja 102	X		X	X
115	W4 Jose Acosta Caballero APPBAJA1386 DUPLICATE: City 115, (Part of) Baja 102	Hearing Examiner Ex. 25			
116	W4 Luis Arriagado Aguilera APPBAJA1389 DUPLICATE: City 116, (Part of) Baja 102	X		X	X
117	W4 Jesus Castro Mendoza APPBAJA1392 DUPLICATE: City 117, (Part of) Baja 102	X		X	X
118	Calculations Final Combined (condensed)	X			
119	Calculations Final Combined	X			
120	Calculations Avg Hourly Rate	X			
121	Calculations Baja Payroll Summary	X			
122	Calculations Hours Worked	X			

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123	Calculations Overtime – Min Wage COPYCBE	X			
124	Calculations PSST	X			
125	Calculations Color Key Notes	X			
126	Calculations Min Wage	X			
127	Calculations Overtime – Min Wage	X			
128	Newway Safety Sign In Sheets 2018 NEWWAY-001474-NEWWAY-001541	X	X	X	X
129	Newway Safety Sign In Sheet May 2018 NEWWAY-000594-NEWWAY-000595	X	X	X	X
130	Newway Safety Sign In Sheets 2019 NEWWAY-000520--NEWWAY-000529, 000558, 000591	Hearing Examiner Ex. 4			
131	Newway Safety Sign In Sheets 2020 <i>eml</i> <i>KFG</i> . NEWWAY-000110-NEWWAY-000125, 000143, 000145	X		X	X
132	Email Newway Covid Updates NEWWAY 003422-003424	X		Excluded per HEX MIL Order	Excluded per HEX MIL Order
133	COVID Safety Sign In May 2020 NEWWAY 003445-003446	X		X	
134	Parra Ponce OLS Interview Statement 01292020 SEATTLE-OLS-0998.v2-1004.v2 DUPLICATE: City 134, Newway 26	X		X	X
135	Forler-Grant Email RFI Responses 06122020 <i>handwritten</i>	X		Excluded per HEX MIL Order	Excluded per HEX MIL Order
136	Forler-Grant RFI Responses (email attachment) <i>dupl. of C135?</i>	X		Excluded per HEX MIL Order	Excluded per HEX MIL Order
137	Claudio Gamboa OLS Interview Notes (redacted) 01292020 SEATTLE-OLS-SUPP-0001-0007 DUPLICATE: City 137, Newway 32	X		X	X
138	Patricio Fernandez Borquez OLS Interview Notes 02122020 SEATTLE-OLS-SUPP-0008-0015 DUPLICATE: City 138, Newway 31	X		X	X

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139	Matias Catalan OLS Interview Notes 02192020 SEATTLE-OLS-SUPP-0016-0022 DUPLICATE: City 139, Newway 27	X		X	X
140	Angel Gomez Chavez OLS Interview Notes 03082020 SEATTLE-OLS-SUPP-0023-0029 DUPLICATE: City 140, Newway 30	X		X	X
141	John Diaz OLS Interview Notes 03152019 SEATTLE-OLS-SUPP-0030-0035 DUPLICATE: City 141, Newway 33	X		X	X
142	Newway Employee Handbook	X		X	X
143	Newway Timecards - March 2020 NEWWAY-002471-002476	X			
144	Baja Payroll Summary 6/2018 –7/2020 NEWWAY-002032- NEWWAY-002048	X		X	X
145	Newway Safety Sign in Sheet 07152019 NEWWAY-003985-NEWWAY-003986	Hearing Examiner Ex. 8			
146	Newway Safety Sign in Sheet 03232020 NEWWAY-003258-NEWWAY-003260	X			
147	Newway Safety Sign in Sheet 10022018 NEWWAY-003305-NEWWAY-003329	X			
148	Newway Safety Sign in Sheet 12182018 NEWWAY-004164	Hearing Examiner Ex. 9			
149	Baja Invoices and TimeSheets – Fairview 06132019 – 12112020 NEWWAY-002354-NEWWAY-002435	X			
150	Newway Timecards – Noe Rios NEWWAY-003137-NEWWAY-003138	X			
151	Newway Timecards – Marco Alvarez NEWWAY-002520-NEWWAY-002527	X			

Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
1.	Baja 2018 Invoices to Newway APPBAJA0185- APPBAJA0247 DUPLICATE: City 34, Baja 1 NOTE: City 34 admitted as HEX Ex. 13	X	X	X	X
2.	Baja 2019 Invoices to Newway APPBAJA0248- APPBAJA0359 DUPLICATE: City 35, Baja 2 NOTE: City 35 admitted as HEX Ex. 13	X	X	X	X

STIPULATED EXHIBIT LIST - 10

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Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
3.	Baja 2020 Invoices to Newway APPBAJA0360- APPBAJA0400 DUPLICATE: City 36, Baja 3	X	X		
4.	2018.01.30 Soto Email re Payroll APPBAJA1240- APPBAJA1244		X	X	X
5.	2018.02.12 Soto Email re Payroll APPBAJA1245- APPBAJA1246	X	X	X	X
6.	2018.02.27 Soto Email re Payroll APPBAJA1247- APPBAJA1251	X	X	X	X
7.	2018.03.26 Soto Email re Payroll APPBAJA1252- APPBAJA1254	X	X	X	X
8.	2019.01.01 Soto Email re Payroll APPBAJA1255- APPBAJA1257		X	X	X
9.	2019.01.16 Soto Email re Payroll APPBAJA1258- APPBAJA1260	X	X	X	X
10.	2019.01.30 Soto Email re Payroll APPBAJA1261- APPBAJA1263	X	X	X	X
11.	2019.02.27 Soto Email re Payroll APPBAJA1264- APPBAJA1265	X	X	X	X
12.	2019.03.13 Soto Email re Payroll APPBAJA1266- APPBAJA1267	X	X	X	X
13.	2019.03.26 Soto Email re Payroll Template APPBAJA1268-APPBAJA1271	X	X	X	X
14.	2019.04.09 Soto Email re Payroll APPBAJA1272- APPBAJA1273	X	X	X	X
15.	2019.04.24 Soto Email re Payroll Template APPBAJA1274-APPBAJA1275	X	X	X	X
16.	2019.05.08 Soto Email re Payroll Template APPBAJA1276-APPBAJA1277	X	X	X	X
17.	2019.05.22 Soto Email re Payroll Template APPBAJA1278-APPBAJA1279	X	X	X	X
18.	2019.06.05 Soto Email re Payroll Template APPBAJA1280-APPBAJA1281	X	X	X	X
19.	2019.06.19 Soto Email re Payroll Template APPBAJA1282- APPBAJA1283	X	X	X	X
20.	2019.07.01 Soto Email re Payroll Template APPBAJA1284- APPBAJA1285	X	X	X	X
21.	2019.07.17 Soto Email re Payroll Template APPBAJA1286- APPBAJA1287	X	X	X	X
22.	2019.07.31 Soto Email re Payroll APPBAJA1288- APPBAJA1289	X	X	X	X
23.	2019.08.14 Soto Email re Payroll APPBAJA1290- APPBAJA1291		X	X	X

STIPULATED EXHIBIT LIST - 11

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24.	2019.08.28 Soto Email re Payroll APPBAJA1292- APPBAJA1293		X	X	X
25.	2019.09.11 Soto Email re Payroll APPBAJA1294- APPBAJA1295		X	X	X
26.	2019.09.25 Soto Email re Payroll APPBAJA1296- APPBAJA1297		X	X	X
27.	2019.10.09 Soto Email re Payroll APPBAJA1298- APPBAJA1299		X	X	X
28.	2019.10.23 Soto Email re Payroll APPBAJA1300- APPBAJA1301		X	X	X
29.	2019.11.06 Soto Email re Payroll APPBAJA1302- APPBAJA1303		X	X	X
30.	2019.11.20 Soto Email re Payroll APPBAJA1304- APPBAJA1305		X	X	X
31.	2019.12.04 Soto Email re Payroll APPBAJA1306- APPBAJA1307		X	X	X
32.	2019.12.18 Soto Email re Payroll APPBAJA1308- APPBAJA1309		X	X	X
33.	2019.12.31 Soto Email re Payroll APPBAJA1310- APPBAJA1311	X	X	X	X
34.	2020.01.15 Soto Email re Payroll APPBAJA1312- APPBAJA1313		X	X	X
35.	2020.01.28 Soto Email re Payroll APPBAJA1314-APPBAJA131		X	X	X
36.	2020.02.14 Payroll Notes APPBAJA1316	X	X	X	X
37.	2020.02.26 Soto Email re Payroll APPBAJA1317- APPBAJA1318		X	X	X
38.	2020.03.11 Soto Email re Payroll APPBAJA1319- APPBAJA1320	X	X	X	X
39.	2020.03.25 Soto Email re Payroll APPBAJA1321- APPBAJA1322		X	X	X
40.	2020.04.20 Soto Email re Payroll APPBAJA1323- APPBAJA1324	X	X	X	X
41.	2020.04.24 Soto Email re Payroll APPBAJA1325- APPBAJA1326	X	X	X	X
42.	2020.05.06 Soto Email re Payroll APPBAJA1327- APPBAJA1328		X	X	X
43.	2020.05.20 Soto Email re Payroll APPBAJA1329- APPBAJA1330	X	X	X	X
44.	2020.06.03 Soto Email re Payroll APPBAJA1331- APPBAJA1332	X	X	X	X
45.	Paystubs Alejandro Fiol	X	X	X	X

STIPULATED EXHIBIT LIST - 12

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1	Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
2						
3		APPBAJA0401- APPBAJA0413 DUPLICATE: Baja 45, City 14				
4	46.	Paystubs Angel Gomez Chavez APPBAJA0414- APPBAJA0430 DUPLICATE: Baja 46, City 24	X	X	X	X
5	47.	Check Antonio Machado APPBAJA0431 DUPLICATE: Baja 47, City 78, NW 35	X		X	X
6	48.	Paystubs Antonio Yevenes APPBAJA0432- APPBAJA0439 DUPLICATE: Baja 48, City 46	X	X	X	X
7						
8	49.	Paystubs Bulfrano Brito APPBAJA0440- APPBAJA0452 DUPLICATE: Baja 49, City 47	X	X	X	X
9	50.	Paystubs Claudia Penunuri APPBAJA0453- APPBAJA0507	X	X	X	X
10	51.	Paystubs Claudio Gamboa APPBAJA0508- APPBAJA0545 DUPLICATE: Baja 51, City 16	X	X	X	X
11						
12	52.	Paystubs Cristhian Pelaez Ruiz APPBAJA0546- APPBAJA0558 DUPLICATE: Baja 52, City 13	X	X	X	X
13	53.	Paystubs Cristian Navejas APPBAJA0559- APPBAJA0593 DUPLICATE: Baja 53, City 48	X	X	X	X
14						
15	54.	Paystubs David Giron APPBAJA0594- APPBAJA0597 DUPLICATE: Baja 54, City 49	X	X	X	X
16	55.	Paystubs David San Roman Mendo APPBAJA0598- APPBAJA0603 DUPLICATE: Baja 55, City 50	X	X	X	X
17	56.	Paystubs Diego Rojas Villaseca APPBAJA0604- APPBAJA0605 DUPLICATE: Baja 56, City 51	X	X	X	X
18						
19	57.	Paystubs Edison Chimborazo Macas APPBAJA0606-APPBAJA0638 DUPLICATE: Baja 57, City 52	X	X	X	X
20	58.	Paystubs Emeterio Collins Lopez APPBAJA0639- APPBAJA0646 DUPLICATE: Baja 58, City 53	X	X	X	X
21						
22	59.	Paystubs Evelio Alvarez Ruiz APPBAJA0647- APPBAJA0662 DUPLICATE: Baja 59, City 54	X	X	X	X
23	60.	Paystubs Gabriel Rios Ortiz APPBAJA0663- APPBAJA0670 DUPLICATE: Baja 60, City 55	X	X	X	X

STIPULATED EXHIBIT LIST - 13

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Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
61.	Paystubs Gerardo Guzman Barragan APPBAJA0671- APPBAJA0684 DUPLICATE: Baja 61, City 56	X	X	X	X
62.	Paystubs Gerardo Valencia APPBAJA0685- APPBAJA0728 DUPLICATE: Baja 62, City 57	X	X	X	X
63.	Paystubs Hector Cispedes Rivera APPBAJA0729- APPBAJA0763 DUPLICATE: Baja 63, City 17	X	X	X	X
64.	Paystubs Israel Avila Gasca APPBAJA0764- APPBAJA0784 DUPLICATE: Baja 64, City 58	X	X	X	X
65.	Paystubs Ivan Ponce APPBAJA0785- APPBAJA0811 DUPLICATE: Baja 65, City 23	X	X	X	X
66.	Paystubs Javier Alfaro Perez APPBAJA0812- APPBAJA0820 DUPLICATE: Baja 66, City 59	X	X	X	X
67.	Paystubs Jesus Ramon Castro Mendoza APPBAJA0821- APPBAJA0829 DUPLICATE: Baja 67, City 60	X	X	X	X
68.	Paystubs John Hinestroz Diaz APPBAJA0830- APPBAJA0836 DUPLICATE: Baja 68, City 15, (all of) Newway 12 (APPBAJA0836)	X	X	X	X
69.	Paystubs Jose Acosta Caballero APPBAJA0837- APPBAJA0857 DUPLICATE: Baja 69, City 22	X	X	X	X
70.	Paystubs Jose Alvarez Rodriguez APPBAJA0858- APPBAJA0865 DUPLICATE: Baja 70, City 61	X	X	X	X
71.	Paystubs Jose Estrada Parra APPBAJA0866- APPBAJA0900 DUPLICATE: Baja 71, City 21	X	X	X	X
72.	Paystubs Jose Vega Hernandez APPBAJA0901- APPBAJA0921 DUPLICATE: Baja 72, City 62	X	X	X	X
73.	Paystubs Josue Osuna Tallabas APPBAJA0922- APPBAJA0931 DUPLICATE: Baja 73, City 63	X	X	X	X
74.	Paystubs Julio Cabellero Pacheco APPBAJA0932- APPBAJA0940 DUPLICATE: Baja 74, City 64	X	X	X	X
75.	Paystubs Lucas Ayala APPBAJA0941- APPBAJA0950 DUPLICATE: Baja 75, City 65	X	X	X	X

STIPULATED EXHIBIT LIST - 14

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Baja Ex. #	Description of Exhibit	Stipulated by:	Stipulated by:	Stipulated by:	Stipulated by:
		City (X = Yes)	Baja (X = Yes)	Machado (X = Yes)	Newway (X = Yes)
76.	Paystubs Luis Andres Arrigada Aguilera APPBAJA0951- APPBAJA0968 DUPLICATE: Baja 76, City 20	X	X	X	X
77.	Paystubs Luis Fernandez Rosas APPBAJA0969- APPBAJA0974 DUPLICATE: Baja 77, City 66	X	X	X	X
78.	Paystubs Luis Garcia APPBAJA0975- APPBAJA0980 DUPLICATE: Baja 78, City 67	X	X	X	X
79.	Paystubs Manuel Camus Valdes APPBAJA0981- APPBAJA1022 DUPLICATE: Baja 79, City 68	X	X	X	X
80.	Paystubs Marco Villasenor Harbolte APPBAJA1023- APPBAJA1040 DUPLICATE: Baja 80, City 69	X	X	X	X
81.	Paystubs Martin Ayala Ochoa APPBAJA1041- APPBAJA1048 DUPLICATE: Baja 81, City 70	X	X	X	X
82.	Paystubs Matias Catalan Toro APPBAJA1049- APPBAJA1064 DUPLICATE: Baja 82, City 18	X	X	X	X
83.	Paystubs Miguel Alfaro Pinto APPBAJA1065- APPBAJA1073 DUPLICATE: Baja 83, City 71	X	X	X	X
84.	Paystubs Noe Rios Estrada APPBAJA1074- APPBAJA1088 DUPLICATE: Baja 84, City 72	X	X	X	X
85.	Paystubs Patricio Fernandez Borquez APPBAJA1089- APPBAJA1125 DUPLICATE: Baja 85, City 19	X	X	X	X
86.	Paystubs Ramon Duenas Gomez APPBAJA1126- APPBAJA1141 DUPLICATE: Baja 86, City 73	X	X	X	X
87.	Paystubs Raul Benjamin Hiraes Cuevas APPBAJA1142- APPBAJA1160 DUPLICATE: Baja 87, City 74	X	X	X	X
88.	Paystubs Roberto Hiralez Colin APPBAJA1161- APPBAJA1202 DUPLICATE: Baja 88, City 75	X	X	X	X
89.	Paystubs Roberto Lopez Hernandez APPBAJA1203- APPBAJA1209 DUPLICATE: Baja 89, City 76	X	X	X	X
90.	Paystubs Ruben Gonzalez APPBAJA1210- APPBAJA1236 DUPLICATE: Baja 90, City 77	X	X	X	X
91.	Tools Summary Deductions APPBAJA1239			X	X
92.	[deleted]				
93.	[deleted]				

STIPULATED EXHIBIT LIST - 15

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Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
94.	Payroll Summ 061320 to 063020 APPBAJA0031 DUPLICATE: City 39, Baja 94	X	X	X	X
95.	Payroll Summ 070120 to 073120 APPBAJA0032- APPBAJA003 DUPLICATE: City 40, Baja 95	X	X	X	X
96.	Payroll Summ 080120 to 083120 APPBAJA0034- APPBAJA0135 DUPLICATE: City 41, Baja 96	X	X	X	X
97.	[deleted]				
98.	2019.09.16 Email Grant to Soto APPBAJA0136- APPBAJA0137 DUPLICATE: Baja 98, NW 7, City 83	X	X	X	X
99.	Newway Soto Correspondence APPBAJA0138- APPBAJA0153 DUPLICATE: (Part of) Baja 99, (Part of) Machado 4, (Part of) Machado 5 DUPLICATE: (Part of) Baja 99, (Part of) Machado 6, (Part of) NW 8, Baja 130 DUPLICATE: (Part of) Baja 99, (Part of) Machado 7 and (Part of) NW 8	X to APPBAJA 0151 (only)	X		
100.	Invoices from Baja Canada APPBAJA1545- APPBAJA1568	X	X	X	X
101.	[deleted]				
102.	Payroll Information APPBAJA1333- APPBAJA1458	Hearing Examiner Ex. 15			
103.	Payroll Information 2 APPBAJA1459- APPBAJA1544			X	X
104.	Safety Sign In Sheets APPBAJA0163- APPBAJA0176 DUPLICATE: City 10, Baja 104, NW 5,	X	X	X	X
105.	[deleted]				
106.	[deleted]				
107.	Certificate of Formation Baja SEATTLE-OLS-0036 DUPLICATE: Baja 107, City 98	X	X		
108.	1120 Denny Project Update SEATTLE-OLS-0013- SEATTLE-OLS-0024		X		
109.	Denny Way Project Desc SEATTLE-OLS-0051-SEATTLE-OLS-0054 OVERLAP: (Part of) Baja 109 (SEATTLE-OLS-0051), (Part of) City 101	X	X		
110.	Newway Overview SEATTLE-OLS-0046 – SEATTLE-OLS-0048 DUPLICATE: Baja 110; City 100	X	X		
111.	Newway Washington DOR SEATTLE-OLS-0037 - SEATTLE-OLS-0041 DUPLICATE: (Part of) City 99, Machado 14	X	X		

Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
112.	Articles of Inc Baja SEATTLE-OLS-0009- SEATTLE-OLS-0011 DUPLICATE: Baja 112, City 93, Machado 12 DUPLICATE: Baja 112, City 94	X		X	X
113.	[deleted]				
114.	Findings, Determination & Final Order SEATTLEOLS- 0135- SEATTLEOLS- 0184 (2/5/21 VERSION, no SDT, signed 8/5/21) DUP/OVERLAP : City 11, 108, Baja 114, 153, Machado 18, 19, 33, NW 1, 22	X	X	X	X
115.	[deleted]				
116.	Emails Baja - Seattle SEATTLE-OLS-0441- SEATTLE-OLS-0447 DUPLICATE: Baja 116 and Baja 152 (no exhibits), Machado 3, (Part of) Machado 8 and 39, NW 18, NW 34, City 37, City 38	X to Seattle-OLS-0446-0447 (2 pgs.) only		X	X
117.	Timecards 1 SEATTLE-OLS-0867		X		
118.	Timecards 2 SEATTLE-OLS-0868	Hearing Examiner Ex. 22			
119.	Timecards 3 SEATTLE-OLS-0869	Hearing Examiner Ex. 16			
120.	Machado Interview Statement SEATTLE-OLS-1060- SEATTLE-OLS-1067 DUPLICATE: City 25, Baja 120, Newway 24, See also Baja 121-122	X	X	X	X
121.	Machado Interview Statement Ex B SEATTLE-OLS-1068 - SEATTLE-OLS-1069 X-Ref/See also: City 25, Baja 120, Newway 24, Baja 121-122	X		X	X
122.	Machado Interview Statement Ex A SEATTLE-OLS-1070 X-Ref/See also: City 25, Baja 120, Newway 24, Baja 121-122	X		X	X
123.	Newway Organizational Chart 1 SEATTLE-OLS-2246		X		
124.	Newway Organizational Chart 2 SEATTLE-OLS-2247 DUPLICATE: Baja 124, Machado 24, NW 3	X	X	X	X
125.	OLS Questions SEATTLE-OLS-PDR-0993 -1001	X	X	X	X
126.	OLS Wage Summaries SEATTLE-OLS-PDR-1002 -1027				
127.	Declaration of Investigator (iso SDT) SEATTLE-OLS-PDR-2279 -2299 DUPLICATE: City 106 (SEATTLE-OLS-0097-0101), Baja 127, Machado 15 (SEATTLE-OLS-0097-0116), Newway 23	X	X	X	X
128.	[deleted]				
129.	Hours Approved by Newway NEWWAY- 002495- NEWWAY- 002498		X		
130.	Newway email re timecards	X	X	X	X

STIPULATED EXHIBIT LIST - 17

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Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
	DUPLICATE: Baja 130, (Part of) Baja 99, (Part of) Machado 6, (Part of) NW 8				
131.	Payments by Newway NEWWAY- 002056- NEWWAY- 002069			X	X
132.	Timecards – Diego Rojas NEWWAY- 003142- NEWWAY- 003143	X	X		
133.	Timecards – Gerardo Guzman NEWWAY- 002665- NEWWAY-002669	X	X		
134.	Timecards – Hector Cepedes NEWWAY- 003139- NEWWAY- 003140	Hearing Examiner Ex. 10			
135.	Timecards – Javier Alfaro NEWWAY- 003141	X	X		
136.	Timecards – Jesus Castro NEWWAY- 002857- NEWWAY- 002881	X	X		
137.	Timecards – Jose Acosta NEWWAY- 002897- NEWWAY- 002902	Hearing Examiner Ex. 23			
138.	Timecards – Jose Alvarez NEWWAY- 003218- NEWWAY- 003221		X		
139.	Timecards – Jose Vega NEWWAY- 003152- NEWWAY- 003153		X		
140.	Timecards – Julio Cabarello NEWWAY- 003174- NEWWAY- 003178		X		
141.	Timecards – Luis Ariagada NEWWAY- 002794- NEWWAY- 002803		X		
142.	Timecards – Luis Fernandez NEWWAY-002534 - NEWWAY-002538	X	X		
143.	Timecards – Manuel Camus NEWWAY-002961 - NEWWAY-002965	X	X		
144.	Timecards – Marco Villesca NEWWAY-002882 - NEWWAY-002886	X	X		
145.	Timecards – Miguel Alfaro NEWWAY-002714 - NEWWAY-002718	X	X		
146.	Timecards – Patricio Fernandez NEWWAY-002983 - NEWWAY-002987	Hearing Examiner Ex. 27			
147.	Timecards - Raul Hirales NEWWAY- 003004 - NEWWAY-003005	X	X		
148.	Timecards – Roberto Hirales NEWWAY- 002613 - NEWWAY-002628	X	X		
149.	Timecards – Roberto Lopez NEWWAY-002756 - NEWWAY-002760	X	X		
150.	Timecards – Various NEWWAY-002489 - NEWWAY-002494		X		
151.	[deleted]				
152.	Emails OLS and Mercedes Accounting DUPLICATE: Baja 116, Baja 152 (no exhibits, Machado 3, NW 18, NW 34		X	X	X

STIPULATED EXHIBIT LIST - 18

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Baja Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
153.	OLS Final Order (2/5/21 VERSION, Ex. 16 to 2/3/22 D.Williams dep.) DUP/OVERLAP : City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X	X	X	X
154.	[deleted] N/A				
155.	Payroll Summary Dep. of Acc. N/A				
156.	Baja Appeal N/A				
157.	OLS Questions APPBAJA0154- APPBAJA0162 DUPLICATE: City 42, Baja 157, Machado 9,40, Newway 13	X	X	X	X
158.	Statement of Ponce DUPLICATE: City 12, Baja 158 NOTE: BAJA 158 admitted as HEX Ex. 2	Hearing Examiner Ex. 2			

Machado Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
1.	Machado Pay Stubs, 10/1/21 and 10/8/21 MACHADO 000001			X	X
2.	200110 Email re Possible Construction Case SEATTLE-OLS-0246-0247 (Bates omitted on original)			X	X
3.	201207 Email re FW: BCUSAC Interview SEATTLE-OLS-0250-0256 DUPLICATE: Machado 3, (Part of) Machado 8 and 39, NW 18, NW 34, Baja 116 and Baja 152 (no exhibits), (Part of) City 37, (Part of) City 38	X – SEATTLE-OLS-0255-0256 (only)	X	X	X
4.	200501 Emails re Fw: Release w/ Attachment APPBAJA0138-0140 DUPLICATE: Machado 4, (Part of) Baja 99			X	X
5.	200513 Emails from Roberto Soto to Connor Forler re New Workers APPBAJA0141 DUPLICATE: Machado 5, (Part of) Baja 99	X		X	
6.	190918 Emails from Kwynne Forler-Grant re Employees for Baja and Potential Fraud Unmarked, APPBAJA0151 DUPLICATE (APPBAJA0151): (Part of) Machado 6, (Part of) Baja 99, (Part of) NW 8 DUPLICATE (Unmarked): (Part of) Machado 6, City #81	X		X	X

Machado Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
7.	19-528 Email re 1120 Denny Way Safety Performance Monthly Report APPBAJA0152-0153 DUPLICATE: Machado 7, (Part of) Baja 99, (Part of) NW 8		X	X	X
8.	Baja Employee Deduction and Contribution Details APPBAJA0003 DUPLICATE: Machado 8, 39, (Part of) Machado 3, City 38, (Part of) Baja 116, (Part of) NW 18, (Part of) NW 34	X		X	X
9.	OLS Initial Request for Information APPBAJA0154-0162 DUPLICATE: City 42, Baja 157, Machado 9,40, Newway 13	X	X	X	X
10.	Timesheets Signed by Chris B. APPBAJA0189-0196 DUPLICATE: (Part of) City 34, (Part of) Baja 1, Machado 10 (all)	X	X	X	
11.	Timesheets Signed by Craig Keuchel APPBAJA00219-0227 DUPLICATE: (Part of) City 34, (Part of) Baja 1, Machado 11 (all)	X	X	X	
12.	Articles of Incorporation for Baja Concrete USA SEATTLE-OLS-0009-0010 DUPLICATE: Machado 12, City 93, (Part of) Baja 112	X		X	X
13.	LNI Listed Governors for Baja Concrete USA SEATTLE-OLS-0028 -0030 OVERLAP: City 96, Machado 13, NW 36	X		X	X
14.	WSDR Listed Governors of Newway SEATTLE-OLS-0037 DUPLICATE: (Part of) City 99, (Part of) Baja 111	X	X	X	X
15.	Declaration of Williams ISO Subpoena Duces Tecum SEATTLE-OLS-0097-0116 DUPLICATE: Machado 15, City 106 (SEATTLE-OLS- 0097-0101), Baja 127 (SEATTLE-OLS-PDR-2279-2299), Newway 23 (SEATTLE-OLS-0097-0116)	X – SEATTLE-OLS-0097-0101 (only)		X	X
16.	Notice of Dismissal as to Onni, Franco Corona, and Carlos Penunuri SEATTLE-OLS-0129		X	X	X
17.	Dismissal as to Salvatore Giantomaso and Claudia Penunuri SEATTLE-OLS-0134		X	X	X

Machado Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
18.	Determination and Attachments A and B There to SEATTLE-OLS-0135-0174 (2/5/21 VERSION, no SDT, signed dated 8/5/21) DUP/OVERLAP : City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X	X	X	X
19.	Subpoena Duces Tecum to All Parties SEATTLE-OLS-0179-0184 DUP/OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X	X	X	X
20.	Timesheets Signed by Tom Grant APPBAJA0292-0296 DUPLICATE: (Part of) City 35, (Part of) Baja 2, Machado 20 (ALL)	X	X	X	X
21.	Williams letter dated January 11, 2021 SEATTLE-OLS-0260-0265			X	X
22.	Email from Daron Williams to Alex Larkin and Mark Kimball dated 2/24/21	Excluded per HEX 6/12/23 (settlement purposes only)		X	X
23.	Baja USA Business Card SEATTLE-OLS-0985 DUPLICATE: Newway 2, Machado 23	Hearing Examiner Ex. 20- Part 2 of 2			
24.	Newway Organizational Chart SEATTLE-OLS-2247 DUPLICATE: Baja 124, Machado 24, NW 3	X	X	X	X
25.	Final Calculations <u>Excel</u> Spreadsheet SEATTLE-OLS-2604	X		X	X
26.	Final Calculations <u>Excel</u> Spreadsheet SEATTLE-OLS-2607	X		X	X
27.	Williams 6/10/20 Memo to Case File SEATTLE-OLS-2579-2594			X	X
28.	Case Notes SEATTLE-OLS-3017-3023			X	X
29.	Timecard for Connor Forler SEATTLE-OLS-PDR 0563			X	
30.	Description of Newway Supervisors SEATTLE-OLS-PDR 0570-0571		X	X	X
31.	Baja Concrete's Responses to Appellant Machado's Requests for Admission dated February 22, 2022	Hearing Examiner Ex. 21			
32.	29 CFR 791.2 Joint Employment			X	X
33.	Findings of Fact, Determination, and Final Order (<i>incl. SDT</i>) 2/5/21 VERSION, 50 pgs. DUP/OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, NW 1, 22	X	X	X	X

STIPULATED EXHIBIT LIST - 21

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Machado Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
34.	Dep. of Kwynne Forler-Grant 30(b)(6) DUPLICATE: City 1, Machado 34	X	X	X	X
35.	Dep. of Katie Jo Keppinger 30(b)(6) DUPLICATE: City 6, Machado 35	X	X	X	X
36.	Dep. of Daron Williams 30(b)(6) DUPLICATE: City 7, Machado 36	X	X	X	X
37.	Dep. of Mercedes DeArmas DUPLICATE*: Machado Exhibit 37 (full pg), City Exhibit 8 (condensed) *except formatting	X	X	X	X
38.	Dep. of Mercedes DeArmas 30(b)(6) DUPLICATE*: Machado Exhibit 38 (full pg), City Exhibit 3 (condensed) *except formatting	X	X	X	X
39.	Baja Deductions and Contributions APPBAJA0003 (Ex.3 to 5/11/22 DeArmas Dep.) DUPLICATE: Machado 8, 39, City 38, (Part of) Machado 3, (Part of) Baja 116, (Part of) NW 18, (Part of) NW 34	X		X	X
40.	Initial Request for Information APPBAJA0154-0162 (Ex.9 to 4/26/22 Baja30b6/DeArmas Dep.) DUPLICATE: City 42, Baja 157, Machado 9,40, Newway 13	X	X	X	X
41.	Payroll Summary (Ex.9 to 5/11/22 DeArmas Dep)			X	X
42.	Laborer Timesheets NEWWAY 002437-002440			X	X
43.	Baja Concrete LTD Invoice SEATTLE-OLS-0256 (Ex.10 to 4/26/22 Baja30b6/DeArmas Deposition)			X	X

Newway Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
1.	OLS Determination (50 pgs, 2/5/21 VERSION incl.SDT) DUP/OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X	X	X	X
2.	Baja business card SEATTLE-OLS-0985	Hearing Examiner Ex. 20 Part 1 of 2			
3.	Newway Org. Chart SEATTLE-OLS-2247 DUPLICATE: Baja 124, Machado 24, NW3	X	X	X	X
4.	Baja Invoices to Newway NEWWAY-002078 – NEWWAY-002091			X	X
5.	Newway Safety Sign-In Sheet APPBAJA0163- APPBAJA0176 DUPLICATE: City 10, Baja 104, NW 5	X	X	X	X
6.	Email from K. Grant to Roberto 1/2/19			X	X

Newway Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
7.	Email from K. Grant to Roberto 9/16/19 DUPLICATE: NW 7, Baja 98, City 83	X		X	X
8.	Email from K. Grant to Roberto 9/18/19 DUPLICATE: NW 8 (APPBAJA 00151-00153), (Part of) Baja 99, (Part of) Machado 6, (Part of) Machado 7		X	X	X
9.	Baja Employee Details <i>APPBAJA0004-APPBAJA00079</i>			X	X
10.	Baja Invoice to Newway <i>NEWWAY-002160 – NEWWAY-002164</i>	X		X	X
11.	Email Casa Latina to OLS (1/10/2020)			X	X
12.	Hinestroz Diaz Paystub <i>APPBAJA0836</i> DUPLICATE: Partial Baja 68, all Newway 12 (APPBAJA00836)	X	X	X	X
13.	Baja Information Responses <i>APPBAJA0154- APPBAJA0162</i> DUPLICATE: City 42, Baja 157, Machado 9,40, Newway 13		X	X	X
14.	L&I Paperwork – Gomez Chavez			X	X
15.	L&I Paperwork – Parra Ponce			X	X
16.	L&I Paperwork - Gamboa Lopresti			X	X
17.	L&I Paperwork – Catalan Toro			X	X
18.	Email thread DeArmas to Williams (12/7/20) <i>SEATTLE-OLS-0250-0256</i> DUPLICATE: NW 18, NW 34, Machado 3, (Part of) Machado 8, (Part of) Machado 39, Baja 116 and Baja 152 (No exhibits), (Part of) City 38, (Part of) City 37	X - SEATTLE -OLS- 0255-0256 (only)		X	X
19.	Baja Letter Employment Gonzalez (10/21/18) <i>SEATTLE-OLS-0989</i>			X	X
20.	OLS Letter to Baja (5/22/2020) <i>SEATTLE-OLS-0064</i>			X	X
21.	OLS Letter to Newway (5/22/2020) <i>SEATTLE-OLS-0076</i> DUPLICATE: Partial City 105, all Newway 21	X		X	X
22.	OLS Subpoena Duces Tecum (<i>incl. Not. Dism. Onni, Corona, Carlos Penunuri</i>) <i>SEATTLE-OLS- 0123 - SEATTLE-OLS-0133</i> DUP/ OVERLAP: City 11, 108, Baja 114, 153, Machado 18, 19, 33, Newway 1, 22	X – SEATTLE -OLS- 0123-0128 (only)		X	X
23.	Williams Dec. SDT (<i>incl. Ex. 1, 2</i>) <i>SEATTLE-OLS- 0097 - SEATTLE-OLS-0116</i> DUPLICATE: Newway 23, City 106 (SEATTLE- OLS-0097-0101), Baja 127 (SEATTLE-OLS-PDR- 2279-2299), Machado 15 (SEATTLE-OLS-0097- 0116)	X		X	X

Newway Ex. #	Description of Exhibit	Stipulated by: City (X = Yes)	Stipulated by: Baja (X = Yes)	Stipulated by: Machado (X = Yes)	Stipulated by: Newway (X = Yes)
24.	Interview Notes – Machado <i>SEATTLE-OLS-1060- SEATTLE-OLS-1067</i> DUPLICATE: City 25, Baja 120, Newway 24, See also Baja 121-122	X	X	X	X
25.	Interview Notes (5/13/2020) <i>SEATTLE-OLS-1145- SEATTLE-OLS-1148</i>			X	X
26.	Interview Notes – Ponce <i>SEATTLE-OLS-0998.v2 -1004.v2</i> DUPLICATE: City 134, Newway 26	X		X	X
27.	Interview Notes – Catalan <i>SEATTLE-OLS-SUPP-0016 -0022</i> DUPLICATE: City 139, Newway 27	X		X	X
28.	Interview Notes (3/8/2020) <i>SEATTLE-OLS-1117-SEATTLE-OLS-1124</i>			X	X
29.	Interview Statement (3/8/2020) <i>SEATTLE-OLS-1125 - SEATTLE-OLS-1131</i>			X	X
30.	Interview Notes – Gomez Chavez <i>SEATTLE-OLS-SUPP-0023 -0029</i> DUPLICATE: City 140, Newway 30	X		X	X
31.	Interview Summary – Borquez <i>SEATTLE-OLS-SUPP-0008 -0015</i> DUPLICATE: City 138, Newway 31	X		X	X
32.	Interview Notes – Gamboa <i>SEATTLE-OLS-SUPP-0001 -0007</i> DUPLICATE: City 137, Newway 32	X		X	X
33.	Interview Statement – Hinestroza Diaz <i>SEATTLE-OLS-SUPP-0030- 0035</i> DUPLICATE: City 141, Newway 33	X		X	X
34.	12/7/2020 Email De Armas to Williams <i>SEATTLE-OLS-0250-0256</i> DUPLICATE: NW 34, NW 18, Machado 3, (Part of) Machado 8, (Part of) Machado 39, Baja 116 and Baja 152 (No exhibits), (Part of) City 38, (Part of) City 37	X – SEATTLE -OLS- 0255-0256 (only)	X	X	X
35.	Check to Machado (100181 \$4878 8/8/19) DUPLICATE: City 78, Baja 47, Newway 35	X		X	X
36.	Baja Registration Status (L&I) OVERLAP: City 96, Machado 13, Newway 36	X		X	X
37.	Baja Invoices to Newway <i>SEATTLE-OLS-PDR-1864-65, 1879-2148 (272pgs.)</i>		X	X	X
38.	Baja Employee Paystubs <i>SEATTLE-OLS-PDR-0865 - 0987</i>		X	X	X
39.	Baja Payroll Summaries (123pgs.)			X	X
40.	Newway OLS Response <i>SEATTLE-OLS-PDR-1866 -1878 (13pgs.)</i>			X	X
41.	Onni Answers to OLS Questionnaire <i>SEATTLE-OLS-PDR-2149 -2220 (72pgs.)</i>			X	X

STIPULATED EXHIBIT LIST - 24

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1 DATED this 11th day of August, 2023.

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STIPULATED EXHIBIT LIST - 25

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