

ENDORSED FILED
November 29, 2022
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SUTTER
CLERK OF THE COURT
By: Brenda Johnson, Deputy

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Attorneys for Plaintiff VICTOR LOPEZ as an individual and on behalf of all employees
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
THE COUNTY OF SUTTER

VICTOR LOPEZ as an individual and on
behalf of all employees similarly situated,

Plaintiff,

v.

VALLEY CUSTOM HARVESTING, LLC;
and DOES 1 through 50, inclusive,

Defendants.

Case No. CVCS20-0001035

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
HEARING FOR MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT

Assigned for all purposes to:
Hon. Perry Parker, Dep.:

Complaint filed: July 1, 2020
Trial Date: Not Yet Set

1 **TO THE HONORABLE COURT:**

2 Plaintiff VICTOR LOPEZ (“Plaintiff”) and Defendant VALLEY CUSTOM
3 HARVESTING. (“Defendant”) (Plaintiff and Defendant referred to herein as the “Parties”)
4 jointly stipulate as follows:

5 **WHEREAS**, the Court granted preliminary approval of the settlement on October 27,
6 2022, and the court signed the Order granting preliminary approval of the settlement;

7 **WHEREAS**, the Parties have met and conferred on this issue and agree that the current
8 hearing date of December 5, 2022, for Final Approval of the settlement will not allow enough
9 time for the notice to be mailed and the period for Class Members to object or opt-out of the
10 settlement; and

11 **WHEREAS**, in order to provide adequate time for the third-party administrator to timely
12 conduct its required responsibilities and the expiration of the opt-out period for Class Members
13 consistent therewith, the Parties agree the current December 5, 2022, Final Approval of Class
14 Action Settlement hearing and current imposed dates consistent therewith should be continued to
15 April 3, 2023 at 9:00 a.m.

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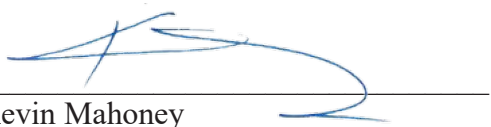
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NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties to the above-captioned action, through their respective counsel, that the hearing for Final Approval of Class Action Settlement be continued to April 3, 2023 at 9:00 a.m., or a date thereafter convenient for the Court, and Plaintiff will file the Motion for Final Approval of the Class Action Settlement and supporting documents sixteen (16) Court days prior to the hearing.

IT IS SO STIPULATED AND AGREED BY THE PARTIES.

Dated: November 21, 2022

MAHONEY LAW GROUP, APC



Kevin Mahoney
Attorneys for Plaintiff VICTOR LOPEZ,
individually and on behalf of all others similarly
situated

Dated: 11-21-22

COOK BROWN, LLP



Terry A. Wills, Esq.
Attorney for Defendant VALLEY CUSTOM
HARVESTING

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~~**PROPOSED**~~ **ORDER**

Based upon the above Stipulation of the Parties, and good cause appearing,

IT IS HEREBY ORDERED that:

1. The December 5, 2022 Hearing for Plaintiff’s Motion for Final Approval of Class Settlement is continued to April 3, 2023 at 9:00 a.m. (or _____).
2. Plaintiff is to file his motion for final approval by _____ 16 court days prior to the April 3, 2023 hearing.

~~**IT IS SO ORDERED.**~~

Dated: 11/28/2022

PERRY PARKER

THE HONORABLE PERRY PARKER

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PROOF OF SERVICE
Code of Civ. Proc. § 1013a, subd. (3)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 249 East Ocean Boulevard, Suite 814, Long Beach, California, 90802.

On **November 22, 2022**, I served true copies of the following document(s): **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING FOR MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**. I served the document(s) on the person(s) below as follows:

Terry A. Wills, Esq. COOK BROWN, LLP 2407 J Street, Second Floor Sacramento, CA 95816	Attorneys for Defendant VALLEY CUSTOM HARVESTING, LLC Telephone: (916) 442-3100 Fax: (916) 442-4227 Email: twills@cookbrown.com kbowling@cookbrown.com
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The document(s) were served by the following means:

By e-mail: Based upon court order or an agreement of the parties to accept service by e-mail, I caused the document(s) to be sent to the persons at the electronic service addresses listed above from the email address rcastilla@mahoney-law.net. Within a reasonable time after the transmission, no error, electronic message or any other indication that the transmission was unsuccessful was received.

(State): I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **November 22, 2022**, at Long Beach, California.

Rosa Saucedo
Rosa Saucedo