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Clerk of the Superior Court
By M. Guyot ,Deputy Clerk

6 Attorneys for Plaintiff,
7 Attorney for Plaintiff,
8 Victor Manuel Ibarra, on behalf of himself and all others similarly situated, and on behalf of the
9 general public

9 Matthew E. Farmer, Bar No. 190484
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10 **LITTLER MENDELSON, P.C.**
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13 Attorneys for Defendant,
14 **PRECISION METAL PRODUCTS, INC. and HBD INDUSTRIES, INC.**

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SAN DIEGO**

17
18 VICTOR MANUEL IBARRA, on behalf of
19 himself and all others similarly situated, and
20 on behalf of the general public,

CASE NO. 24CU003229C

21 Plaintiff,

**JOINT STIPULATION TO CONTINUE
FINAL APPROVAL HEARING;
[PROPOSED] ORDER THEREON**

22 vs.

23 **PRECISION METAL PRODUCTS, INC., a**
24 **Delaware Corporation, HBD INDUSTRIES,**
INC., a Delaware Corporation, and DOES 1
25 **through 10, inclusive,**

26 Defendants.
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1 Plaintiff VICTOR MANUEL IBARRA (“Plaintiff”) and Defendants PRECISION METAL
2 PRODUCTS, INC. and HBD INDUSTRIES, INC. (“Defendants”) (collectively, the “Parties”)
3 hereby stipulate and agree as follows:

4 WHEREAS, on November 10, 2025, Plaintiff filed a Motion for Preliminary Approval of
5 Class and Representative Action Settlement, along with supporting documents, thereby seeking
6 preliminary approval of the Parties’ Class Action and PAGA Settlement Agreement;

7 WHEREAS, on December 16, 2025, this Court approved and signed the Order granting
8 preliminary approval of the Settlement and set a Final Approval Hearing date on April 3, 2026.

9 WHEREAS, on December 17, 2026, the Parties submitted a Stipulation to Amend Class
10 Period. The Order amending the Class Period was signed by the Court on December 24, 2025, but
11 the Parties did not receive it until January 6, 2026.

12 WHEREAS, because the notice process to Class Members has not yet begun and, therefore,
13 will not be completed prior to the current Final Approval Hearing date, the Parties request a
14 continuance of the Final Approval Hearing to a date that is on or after May 29, 2026 that is convenient
15 for the Court.

16 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, and
17 respectfully requested that the Court continue the Final Approval Hearing to a date that is on or after
18 May 29, 2026, that is convenient for the Court.

19 **IT IS SO STIPULATED ON THE DATES INDICATED BELOW**

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22 Dated: January 22, 2026

OTKUPMAN LAW FIRM,
A Law Corporation

23
24
25 By: 

26 ROMAN OTKUPMAN
27 NIDAH FARISHTA
28 Attorneys for Plaintiff

1 Dated: January 22, 2026

LITTLER MENDELSON, P.C.

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By: *Matthew E Farmer*

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Matthew E. Farmer
Attorneys for Defendant

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~~PROPOSED~~ ORDER

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2 **GOOD CAUSE APPEARING**, and pursuant to the Joint Stipulation of the Parties, **IT**
3 **IS HEREBY ORDERED** that:

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5 1. The Final Approval Hearing currently set for April 3, 2026 is continued to

6 June 18, 2026 at 8:30AM in Department C-74.

7 2. All supporting papers must be filed no later than sixteen (16) court days prior to the
8 hearing.

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10 **IT IS SO ORDERED.**

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13 Dated: 1-29-24


14 HON. BLAINE K. BOWMAN