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7 Attorneys for Plaintiff Luis Navarro,  
8 individually and on behalf of all others similarly situated

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14 Attorneys for Defendant.

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **FOR THE COUNTY OF MERCED**

17 LUIS NAVARRO, individually and on  
18 behalf of all others similarly situated

19 Plaintiff,

20 vs.

21 RICHWOOD MEAT COMPANY, INC.;  
22 and DOES 1 through 20, inclusive,

23 Defendants.

Case No. 22CV-02964

*Assigned for all purposes to  
Hon. Judge Mark Bacciarini  
Dept. 8*

**JOINT STIPULATION TO CONTINUE  
MOTION FOR FINAL APPROVAL  
HEARING DATE; AND ~~RECEIVED~~  
ORDER**

Date: February 19, 2025  
Time: 8:15 a.m.  
Dept.: 8

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**JOINT STIPULATION TO CONTINUE MOTION FOR FINAL APPROVAL HEARING DATE; AND  
~~RECEIVED~~ ORDER**

FILED  
MERCED COUNTY

2025 JAN 21 PM 1:02

CLERK OF THE SUPERIOR COURT

BY  DEPUTY

1 Plaintiff Luis Navarro ("Plaintiff") and Defendant Richwood Meat Company, Inc.  
2 ("Defendant") (together, "the Parties") submit the following Joint Stipulation to Continue the  
3 February 19, 2025 Motion for Final Approval hearing:

4 WHEREAS, the Court granted preliminary approval of the Parties' Class Action and PAGA  
5 Settlement Agreement at the November 14, 2024 hearing, and scheduled a hearing for Plaintiff's  
6 forthcoming motion for final approval of class action settlement on February 19, 2025 at 8:15 a.m.;

7 WHEREAS, pursuant to the terms of the Settlement Agreement, the Settlement  
8 Administrator originally set a deadline within 15 days of the Court's order granting preliminary  
9 approval to receive the Class data from Defendants (December 2), and expected to send the initial  
10 mailing of the Class Notice to the Class Members within 14 days of receipt of the Class data  
11 (December 16);

12 WHEREAS, Defendant sent the Class data to the Settlement Administrator on November  
13 18, 2024;

14 WHEREAS, there was a delay in the Settlement Administrator's processing the data due to  
15 the Thanksgiving holiday;

16 WHEREAS, the Settlement Administrator is ready to mail the Class notice to the Class  
17 Members, but based on the current timeline, the Response Deadline will end until February 14,  
18 2025, 5 days before the scheduled hearing on the motion for final approval;

19 WHEREAS, the Parties do not believe 5 days will be enough time to process potential opt-  
20 outs and objections, and respond to any thereto in the final approval motion;

21 WHEREAS, the Parties agree a continuance to the final approval hearing is necessary to  
22 allow sufficient time to allow Class Members time to opt-out or submit objections to the settlement;  
23 and for the Parties to file the motion for final approval of the settlement, and respond to any potential  
24 objections;

25 WHEREAS, the Parties agree a continuance of the final approval hearing by 45 days or a  
26 date thereafter that is convenient for the Court, will provide sufficient time to complete all necessary  
27 tasks prior to the hearing.

1           THEREFORE, the parties, by and through their respective attorneys of record, HEREBY  
2 STIPULATE AND REQUEST AS FOLLOWS:

3           1) The February 19, 2025 Motion for Final Approval hearing date should be continued by  
4 45 days or another date convenient to the Court.

5  
6 Dated: December 18, 2024

AEGIS LAW FIRM, PC

7  
8 By: 

Alex J. Valle  
Attorneys for Plaintiff Luis Navarro

9  
10  
11 DATE: December 18, 2024

LAW OFFICES OF ROBBINS, BROWNING,  
GODWIN & MARCHINI

12  
13 By:

/s/ Corbett J. Browning  
Corbett J. Browning  
Attorneys for Defendant

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~~PROPOSED~~ ORDER

Having read and considered the Parties' Joint Stipulation to Continue the Motion for Final Approval Hearing date (the "Stipulation"), the facts upon which the Stipulation is based, and good cause appearing, it is hereby ORDERED as follows:

1. The Motion for Final Approval Hearing date set for February 19, 2025, at 8:15 a.m. is continued to March 26, 2025, at 8:15 a.m. /

~~XXXX~~

IT IS SO ORDERED.

DATED: 01/17/2025

*Stephanie L. Jamieson*  
~~XXXXXXXXXXXX~~ Honorable Mark Batorian Stephanie Jamieson  
JUDGE OF THE SUPERIOR COURT

**CERTIFICATE OF SERVICE**

I, the undersigned, am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; am employed with Aegis Law Firm PC and my business address is 9811 Irvine Center Drive, Suite 100, Irvine, California 92618.

On December 18, 2024, I served the foregoing document entitled:

- JOINT STIPULATION TO CONTINUE MOTION FOR FINAL APPROVAL HEARING DATE; AND ~~PROPOSED~~ ORDER

on all the appearing and/or interested parties in this action by delivering ☐ the original ☒ a true copy thereof on the party(ies) addressed below as follows:

Corbett J. Browning  
**ROBBINS, BROWNING, GODWIN & MARCHINI**  
700 Loughborough Drive, Suite D  
Merced, California 95344-0067  
Telephone: 209-383-9334  
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[cjb@rbgmlaw.com](mailto:cjb@rbgmlaw.com)  
[tm@rbgmlaw.com](mailto:tm@rbgmlaw.com)  
*Attorneys for Defendant:*  
RICHWOOD MEAT COMPANY, INC.

☐ **(BY MAIL)** I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing this affidavit. (*Cal Code Civ. Proc. § 1013(a); Fed. R. Civ. Proc. 5(a); Fed. R. Civ. Proc. 5(c).*)

☐ **(BY OVERNIGHT MAIL)** I am personally and readily familiar with the business practice of Aegis Law Firm PC for collection and processing correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained Federal Express for overnight delivery. (*Cal Code Civ. Proc. § 1013(c); Fed. R. Civ. Proc. 5(c).*)

☒ **(BY ELECTRONIC TRANSMISSION)** I caused said document(s) to be served via electronic transmission via the above listed email addresses on the date below. (*Cal. Code Civ. Proc. § 1010.6(6); Fed. R. Civ. Proc. 5(b)(2)(E); Fed. R. Civ. Proc. 5(b)(3).*)

☐ **(BY PERSONAL SERVICE)** I delivered the foregoing document by hand delivery to the addressed named above. (*Cal Code Civ. Proc. § 1011; Fed. R. Civ. Proc. 5(b)(2)(A).*)

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

Executed on December 18, 2024, at Irvine, California.

*Laila Shams*  
Laila Shams