

Electronically Received 04/03/2024 06:01 PM

FILED
Superior Court of California
County of Los Angeles
04/08/2024

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Attorneys for Plaintiff Teri Flores, individually,
and on behalf of all others similarly situated.

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

TERI FLORES, an individual,

Plaintiff,

vs.

SERENDIB HOLDINGS GROUP, LLC;
SERENDIB HEALTHWAYS, INC.;
JANERSI DE SILVA, M.D.; JANERSI DE
SILVA, M.D. A PROFESSIONAL
CORPORATION; and DOES 1 through 20,
inclusive,

Defendants.

Case No. 20STCV00289

Assigned for all purposes to:
Hon. Elihu M. Berle
Dept. 6

**STIPULATION TO VACATE HEARING AND
SET CLASS NOTICE DEADLINES;
PROPOSED ORDER**

STIPULATION TO VACATE HEARING AND SET CLASS NOTICE DEADLINES

1 **TO THE COURT, TO ALL PARTIES, AND TO THEIR RESPECTIVE**
2 **ATTORNEYS OF RECORD:**

3 WHEREAS, counsel for Plaintiff Teri Flores (“Plaintiff”) and counsel for Janesri De Silva
4 M.D., a Professional Corp. (“Defendant”) (collectively, the “Parties”) have met and conferred
5 regarding the class data and have resolved any outstanding discrepancies;

6 WHEREAS, the settlement administrator has confirmed it can mail class notices in 10
7 business days;

8 WHEREAS, in light of the foregoing and to preserve the time and resources of the Court
9 and the Parties, the Parties respectfully request the Court vacate the continued hearing on
10 Plaintiff’s *ex parte* application and set final approval deadlines.

11 **THEREFORE, IT IS HEREBY STIPULATED** by and between the attorneys for the
12 Parties that:

- 13
- 14 1. The April 8, 2024 continued hearing on Plaintiff’s Ex Parte Application be taken off
15 calendar.
 - 16 2. The Final Approval Hearing and related deadlines shall be set as follows:
 - 17 a. The Class Notices must be mailed no later than April 18, 2024.
 - 18 b. Any opt-outs or objections to the Settlement are due no later than June 17, 2024.
 - 19 c. Plaintiff must file her motion and request for attorneys’ fees no later than May
20 17, 2024.
 - 21 d. An administrator report must be filed no later than July 5, 2024.
 - 22 e. A Final Fairness and Approval hearing shall be held before this Court on July
23 19, 2024 at 9:00 a.m.

24
25 DATED: April 3, 2024

AEGIS LAW FIRM, PC

/s/ Carolyn Bell

CAROLYN BELL
Attorneys for Plaintiff

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DATED: April 3, 2024

BLAIR & RAMIREZ LLP



OSCAR RAMIREZ
DAVID OSORIO
KIRILL LAVINSKI
Counsel for Defendants

1 **[PROPOSED] ORDER**

2 Upon review of the Stipulation to Continue Hearing on Motion for Final Approval and
3 Related Deadlines, and finding good cause, it is GRANTED.

4 **IT IS HEREBY ORDERED THAT:**

- 5 1) The April 8, 2024 hearing on Plaintiff's Ex Parte Application is vacated.
6
7 2) The Class Notices must be mailed no later than April 18, 2024.
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9 3) Any opt-outs or objections to the Settlement are due no later than June 17, 2024.
10
11 4) Plaintiff must file her motion and request for attorneys' fees no later than May 17, 2024.
12
13 5) An administrator report must be filed no later than July 5, 2024.
14
15 6) A Final Fairness and Approval hearing shall be held before this Court on July 19, 2024
16 at 9:00 a.m.



Elihu M. Berle

Dated: 04/08/2024

Elihu M. Berle / Judge

Elihu M. Berle

Judge of the Superior Court